

# Final Draft Local Plan by Consultee 16.12.24

Araripe Limited, Pegasus Group, Executive Director, Onions, David

<b>Comment ID</b>	NULLP647
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Policy PSD 2 sets out the overarching settlement hierarchy for the Borough, with Newcastleunder- Lyme as the main Strategic Centre. Urban Centres, Rural Centres, and Other Settlements and Rural Areas are also identified. Within the Urban Centres category, it is made clear that Kidsgrove incorporates Talke and Butt Lane, and that this is a key location for growth within the Borough. The Sustainability Appraisal (July 2024) confirms that Kidsgrove is a sustainable location for further growth, where development can have positive impacts on climate change, transport and accessibility, physical and mental health and wellbeing, and equality. Araripe Limited strongly support this policy, which is considered to be justified.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17’s suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP651
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p>

	<p>Policy PSD 7 makes reference to major developments having to demonstrate that they have responded positively to the Design Review process. However, as previously raised by Araripe Limited in response to the First Draft Local Plan, the requirement for all major developments to be subject to a Design Review process is likely to be untenable in view of the number of schemes which would fall into the major category, i.e. 10 more units. Moreover, this element of the policy is inconsistent with the supporting text which states, at paragraph 5.47, that a Design Review is only required for “large and complex sites”, rather than all forms of major development. This is considered a more appropriate and manageable approach. As such, this aspect of the policy should be amended accordingly, to align with the supporting text, ensuring that the policy will be effective.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17’s suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP655
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>This is a new policy, which previously formed part of Policy HOU 2 in the First Draft Local Plan. This includes a requirement to provide homes to M4(2) and M4(3) standards. The policy itself currently refers to the “Part 4(2)” standard, and this should be amended to read “Part M4(2)”. The supporting text suggests, at paragraph 7.27, that a need to increase the supply of these dwellings has been identified in the Housing Needs Assessment. It is assumed that the Council mean the HENAFU, but accessible and adaptable dwellings are not referenced within this. The policy must be based on evidence in order to be justified, and this evidence should be clearly set out within the supporting text. Moreover, paragraph 7.28 of the supporting text implies that the M4 (3) (2) (a) requirements are optional, whereas the main policy makes clear that this is mandatory (for 10% of market dwellings on major developments). The supporting text should be amended for clarity.</p> <p>Policy HOU3 also states that new residential development must comply with the Nationally Described Space Standards (NDSS). Footnote 52 of the NPPF is clear that planning policies should only refer to NDSS where the need for this can be justified. Such a justification is not provided within the policy or its supporting text, with evidence instead provided in the NDSS Topic Paper (March 2024). The Topic Paper’s analysis finds that 43% of dwellings recently approved in Newcastle-under-Lyme fail to comply with NDSS, with smaller dwellings the least likely to meet the standards. The Council assert, at paragraph 21 of the report, that this demonstrates a need to adopt the standards, as there is a record in failing to provide dwellings of an adequate size in the Borough. It is noted that the Council’s Viability Assessment concludes that NDSS would not impact on the viability of schemes. Notwithstanding, it is considered that the study in the NDSS Topic Paper is highly flawed and lacks robustness. The sample size was small, with just 198 recently approved dwellings measured, and is not necessarily representative, as acknowledged in paragraph 24 of the Topic Paper. What’s more, the data arguably suggests the opposite, with the average size of properties exceeding NDSS standards for all dwellings with two bedrooms or more. Almost 60% of all dwellings meet or exceed the standard. In any case, the Government does not state that dwellings which do not quite meet NDSS are too small for habitation, hence why the standard is not mandatory. As such, it is not considered that this high-level study provides the required robust justification for a NDSS policy, and therefore Policy HOU3 is currently unsound on this basis.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP645
<b>Order</b>	15
<b>Number</b>	4
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Strategic Objectives
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke (hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>The Plan identifies 13 Strategic Objectives for the Borough. Only one of these objectives, SO- 5 (V), specifically relates to housing. This refers to the provision of a mix of housing types and aspirational housing. This objective is supported by Araripe Limited, and is consistent with national policy, namely Paragraphs 60 and 63 of the NPPF. However, it is noteworthy that there is no objective which refers to providing sufficient homes in the Borough to meet its identified housing need across the plan period, and the role this can play in supporting economic growth. Such an objective would align with Section 5 of the NPPF, and the economic and social objectives for development set out within Paragraph 8. Araripe Limited have previously highlighted this within representations on the First Draft Local Plan, and the Council are urged to consider the addition of an objective to this effect prior to submitting the plan to the Secretary of State. Placing an emphasis on this would ensure that the key national planning objective of boosting the supply of homes is reflected in this overarching section of the Plan, ensuring its soundness in this respect.</p> <p>Objective S0-12 (XII) refers to the fact that the Green Belt will be protected, unless there are exceptional circumstances to justify the release of land from it. It is implied that the Green Belt must be protected in all other scenarios. This is inconsistent with both national policy and draft Policy PSD5, both of which make clear that Green Belt land which has not been released through the plan-making process can still be developed providing that there are very special circumstances to justify this, or the scheme would form an exception to inappropriate development (Paragraphs 152 – 156 of the NPPF). Thus, this objective is currently unsound, and reference should be added that, whilst the Green Belt can be protected as desired by the Council, some development may still be appropriate or permissible if very special circumstances exist.</p> <p>The remaining strategic objectives are considered to meet the tests of soundness set out in Paragraph 35 of the NPPF, and Araripe Limited do not raise any objections to them.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP649
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside

<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Araripe Limited support the proposed revisions to the settlement boundaries in Newcastleunder-Lyme, which would remove site TK17 from the Green Belt. This amendment is recommended in the Settlement Boundary Review (July 2024).</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17’s suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP653
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Policy HOU 1 states that Council will seek the provision of 30% affordable housing on all greenfield sites. The Housing and Economic Needs Assessment Update (HENU) (March 2023) identifies an annual need of 278 affordable homes per year in Newcastle-under-Lyme, and Araripe Limited support the principle of providing affordable homes to meet this need, subject to a viability assessment where required (it is noted that reference to viability has now been added to the policy, having been omitted in the First Draft Local Plan). Overall, this policy is considered to be positively prepared, justified, and consistent with national policy, with no amendments needed.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several</p>



	amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	1340848 Araripe Limited.pdf
<b>Comment ID</b>	NULLP646
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>The draft policy has been updated to require at least 8,000 dwellings to be delivered over the plan period, which equates to 400 per annum. This exceeds the requirement identified by the current Standard Method of 337 dpa; however, Paragraph 61 of the NPPF is clear that this should simply serve as a starting point for establishing the housing need for an area. The Housing and Economic Needs Assessment Further Update (HENAFU), dated April 2024, recommends that 400 dpa should be provided to support anticipated levels of job creation, and this element of the policy is therefore positively prepared and justified since it aligns with the need identified in the evidence base.</p> <p>Notwithstanding, it is worth highlighting that the draft NPPF proposes to update the Standard Method to identify a requirement equivalent to a 0.8% increase in existing dwelling stock and a revised and increased affordability adjustment. This would increase the minimum housing requirement within the borough by 256 dpa compared to the existing Standard Method, and 193 dpa compared to the emerging policy requirement of 400 dpa, to 593 dpa. This would equate to a shortfall of up to 3,860 homes over the plan period. For clarity, given the late stage the draft plan is at, and the fact that the difference with the housing requirement in the draft policy is less than 200, the plan will be examined under the current NPPF and its lower housing need for Newcastle-under-Lyme. As such, this will not affect the soundness of Policy PSD 1 during examination. However, this does underline the importance of the Council allocating sufficient sites to help ensure that the Borough's increasing need can be met to the greatest degree possible – 400 dpa should only treated as a minimum figure, as stated in the draft policy.</p> <p>Concern is raised regarding deliverability. Whilst a supply of 8,663 dwellings (including an 8.3% buffer) has been set out within the supporting text, and the HENAFU states (at paragraph 5.7) that an average of 399 dwellings have been provided in the Borough over the past five years, suggesting that 400 dpa is deliverable, this data is skewed by two years in which substantially higher levels of student accommodation were provided within the Borough. Reviewing the Council's indicative housing trajectory in Appendix 6 of the Final Draft Local Plan, the delivery of dwellings over the plan period is envisioned to be highly uneven, peaking at over 1,000 dpa in 2028, and dropping to around 20 dpa by 2040. Whilst it is not necessary to deliver an even number of dwellings each year across the plan period, in this case the variation is too significant, and unlikely to address the ever-increasing need towards 2040, with such low numbers of dwellings to be provided – as the policy states, 8,000 is only a minimum figure, and a substantial slow-down in delivery should be avoided. It is uncertain as to whether the high numbers in peak years can even be achieved, since the Council's housing delivery has consistently fallen below both Standard Method's requirement and the need of 400 dpa identified in the evidence base in recent years. Indeed, there are only four occasions in the twenty first century where net additions have exceeded 400 dpa as shown in Figure 3.1 of the HENAFU. Araripe Limited strongly support the Council's commitment within the policy to provide sufficient housing, and it is imperative for a range of deliverable sites to be identified and allocated to achieve this. The housing trajectory should be reviewed in light of the above and the policy must be deliverable in order to be effective and sound.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set

	these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP650
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Policy PSD 5 is consistent with national policy, namely Paragraphs 152 to 156 of the NPPF, and is therefore considered sound on this basis. Araripe Limited support the alteration of the Green Belt boundary at St Martins Road to incorporate site TK17 as an allocation for residential development. Comments on the consideration of the Site in terms of Green Belt and other factors are set out in comments made regarding Section 13.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP654
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p>

	<p>The Policy has been amended to remove the prescriptive mix which featured in the First Draft Local Plan. Whilst this is still set out within the supporting text (at paragraphs 7.18 and 7.19), the policy is clear that the mix only needs to be informed by the latest evidence at the point of submission, from a range of sources; material provided by the applicant or housebuilder, which can provide an up-to-date picture of demand and delivery for market homes, should also be used to inform housing mix where appropriate. The policy's reference to development having to be of an appropriate type and size to the site will allow for flexibility, which is welcome (as, for example, some sites may not be suitable for flats, or elderly accommodation). Indeed, the HENAFU, which contains the latest evidence on type and size, highlights the need for such flexibility, by stating, at paragraph 5.12, that this data continues to represent only illustrative modelling, which should not be prescribed as an explicit requirement for all sites given the need to respond to changing market demands, local context and viability considerations. As such, the policy is justified in this regard, and its commitment to providing a mix of house types is consistent with national policy, namely Paragraph 60 of the NPPF.</p> <p>Notwithstanding, whilst Strategic Objective SO-5 (V) makes reference to the provision of aspirational housing, this is not referenced within the policy. The policy should align with and support the strategic objective to be justified and sound, and as such a reference to the provision of aspirational housing should be inserted. This type of housing can be delivered in locations outside of the inner city, on sites such as TK17.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP657
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke (hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Araripe Limited strongly support the allocation of this site for residential development, and the site-specific requirements set out within the policy are broadly accepted. However, we consider that Policy TK17 is currently unsound, for the following reasons:</p> <ul style="list-style-type: none"> <li>• The policy states that the site is allocated for 40 dwellings. This should be amended to read "approximately 40 dwellings", to provide flexibility – a precise number of dwellings should not be prescribed, to ensure that the policy is effective. The illustrative masterplan in Appendix B shows 35 dwellings on the site, and through further masterplanning, there may be an opportunity to accommodate more than 40 units.</li> <li>• Point 6 notes that a sequential approach will need to be taken within the site to direct development to areas with the lowest risk of flooding. This implies that the sequential test needs to be carried out to identify alternative sites with a lower risk of flooding. However, as an allocated site, the sequential test would not need to be applied, in line with Paragraph 172 of the NPPF. As such, this should be amended to clarify that development within the site itself should be located away from the area which is at risk of surface water flooding (in the west). This will ensure that this point is justified and consistent with national policy.</li> <li>• Points 12 and 13 refer to financial contributions being required for education and Talke signals. This is not justified. Contributions should be based on the latest need when an application is submitted; it may not be necessary to make these contributions at that stage.</li> </ul> <p>The Council's evidence base includes four separate Green Belt assessments. Green Belt Assessment Part 1 (2017) went through a two-stage process identifying general areas of Green Belt and then smaller</p>

parcels. Site TK17 fell within area 7 and parcel 33. The assessment set out in Green Belt Assessment Part 1 identified that parcel 33 made a weak contribution towards the purposes of including land within the Green Belt. Parcel 33 was one of only 13 out of 185 parcels assessed which fell into the 'weak' category.

The Green Belt Assessment Part 2 (2020) went through a further detailed assessment of site TK17. It is worth noting that parcel TK17 considered in the Green Belt Assessment represents a much larger area of land than the draft allocation now identified in the Local Plan. It comprised all the land bounded by St Martin's Road to the north, the A34 Newcastle Road to the east, Talke Road to the south and the High Street to the west. The site capacity was identified as 150 dwellings. The Green Belt site review of this wider parcel went through a series of detailed criteria to establish a range of outcomes which went beyond merely the impact on the purposes of including land within the Green Belt. In particular, the analysis of the site against its suitability for development concluded that the site was suitable for development and would promote sustainable growth. Overall, the conclusion of this detailed assessment was that the site should be taken forward for further consideration with the focus on the potential contamination of part of the site due to the historic Talke Road landfill site.

The assessment also concluded that the site made a weak contribution to Green Belt purposes and its development would not represent unrestricted sprawl, would not result in neighbouring towns merging and would not impact on the setting or character or the historic town of Talke. Development will only entail a small incursion into undeveloped countryside relative to the size of Talke.

The Green Belt Assessment Part 3 assessed six additional sites within the Borough. It also considered the exceptional circumstances which should be identified to justify the release of sites from the Green Belt. In doing so, the study undertook a detailed analysis of the approaches pursued by other Local Authorities when proposing Green Belt release. The approach recommended that for strategic exceptional circumstances, the following should be considered.

- The housing and/or employment need
- Constraints within the Borough Ensuring sustainable patterns of development
- Lack of other reasonable options
- Growth of a strategic facility or sector
- Any other circumstances specific to the Borough

Meanwhile, site-level exceptional circumstances were identified as:

- Performance of the site against Green Belt purposes
- Impact of removing the site on overall function and integrity of the wider Green Belt
- Presence/creation of a recognisable and permanent boundary
- Potential compensatory improvements to the remaining Green Belt
- Sustainability of the site
- Assessment of alternative sites
- Any other circumstances specific to the site in question

In considering the proposed allocation TK17 the following is notable:

- The site has already been found to have a weak performance in terms of meeting the Green Belt purposes. This has been throughout the assessment process and even taking into account the larger site which encompassed land further to the south. The reduction in the site area to that now identified as allocation TK17 further mitigates any Green Belt harm.
- The removal of the site from the Green Belt will have negligible impact on the remaining function and integrity of the wider Green Belt. There will remain a substantial retained area of land between the southern edge of Talke Pits and the northern edge of Newcastle upon Lyme.
- The proposal at TK17 provides the opportunity to create a new recognisable and permanent Green Belt boundary formed by the southern edge of the built development. This already exists in a form of a low-level hedge but can be reinforced both through additional planting but also through the design of a new residential development which will occur.
- The site can provide a new additional link into the Public Rights of Way Network which in turn provides access to the wider Green Belt. This could form part of the compensatory provision and facilitate additional recreational opportunities.
- This site is located immediately on the edge of the built-up area of Talke. A bus stop is immediately adjacent to it. The site has been fully assessed through the Green Belt Part II process to be both sustainable and have potential for new housing development.
- The site would make a contribution towards housing need. The TK17 site has a particular benefit in having the opportunity to provide for aspirational dwellings located in an urban fringe location which would not necessarily be the case elsewhere, particularly on previously developed land within the urban area.
- The site has the opportunity to provide an enhanced approach to Talke Pits Village through a suitable design which could provide a gateway feature of high-quality new development, enhancing the approach to the village.

The Green Belt Assessment (Part 4) was published in July 2024 and consolidates the three previous Green Belt Assessments. It reiterates that the site makes a weak contribution to Green Belt purposes and represents a sustainable location for growth, and that it should therefore be considered for allocation. Its limited contribution as a Green Belt site means that it can be considered 'grey belt' land; the concept of 'grey belt' was introduced in the draft NPPF, and the release and development of grey belt sites is an emerging Government priority.

In view of the above, it has been clearly demonstrated that the draft Allocation TK17 is suitable for removal from the Green Belt and allocation for new housing development. This is both within the strategic context of the Borough requiring Green Belt sites to meet its housing and employment need and because there are clear site-specific circumstances set out above which justify the removal of the site from the Green Belt and its allocation for residential development.

In view of the above, Ararape Limited strongly support the identification of site TK17 as an allocation for residential development and removal from the Green Belt. This is clearly justified by the evidence base and exceptional circumstances exist to underpin the approach taken by the Borough Council. The site can deliver much-needed housing in the short-to-medium term, and thus its allocation contributes to

	ensuring a positively prepared and effective plan. However, as discussed above, minor amendments to Policy TK17 are still required for it to be found sound at examination. Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP648
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the "Site"). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>Araripe Limited support the Council's approach to the distribution of development outlined in this Policy, which is positively prepared as it details how and where the objectively assessed need in the HENAFU will be delivered. Particular support is given to the 800 homes identified for Kidsgrove, although this should be treated as a minimum figure, as acknowledged in paragraph 5.12 of the supporting text. The Site being promoted for residential development by Araripe Limited (TK17) is well positioned to support this growth in the short to medium term following the adoption of the Plan. The policy is justified, with it being informed by the findings of both the Sustainability Appraisal and Housing Spatial Strategy Topic Paper.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17's suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP652
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1



<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>This Policy refers to many aspects of national regulations, including the Building Regulations. It is established practice that other regulatory regimes must operate separately to the planning regime. Reference to the Building Regulations should therefore be deleted. The Council can set its own targets within the policy, without reference to the Building Regulations. However, these must not exceed the current requirements of the Building Regulations, as a Ministerial Statement dated 13th December 2023 made clear that planning policies including greater standards should generally be rejected at examination. It is considered that these amendments are required for this policy to be found sound.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17’s suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>
<b>Comment ID</b>	NULLP656
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Araripe Limited
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Executive Director
<b>Agent Family Name</b>	Onions
<b>Agent Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>These representations are made in response to the Regulation 19 consultation on the final draft of the Newcastle-under-Lyme Local Plan 2020 – 2040. The representations are made by Pegasus Group on behalf of Araripe Limited and relate to their land interest at St Martins Road, Talke(hereafter referred to as the “Site”). The Site is greenfield land situated to the south of Talke. With regards to the Site, these representations should be read alongside the attachment.</p> <p>The requirements set out within the policy are broadly supported by Araripe Limited. However, it is unclear as to when the Council require the masterplan to be prepared and agreed (i.e. as part of the submission of a planning application or prior to this), thus this should be clarified within the policy or its supporting text. The remainder of Policy SA1 primarily links back to other policies within the Final Draft Local Plan, and also includes a requirement for Green Belt compensatory measures to be provided. There should be some flexibility in terms of how much compensation a site is required to provide, and this should be proportionate to its size and the quantum of development proposed.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Sufficient land for housing should be planned for to meet the identified need for this within the Borough. Araripe Limited strongly support the allocation of Site TK17 for residential development, but several amendments are required to make Policy TK17 sound, as set out in paragraph 3.19 of the accompanying written representations. We would welcome the opportunity to participate in the hearing sessions to set these out, as well as to draw attention to the other matters which need to be addressed to ensure soundness elsewhere in the final draft plan, whilst emphasising site TK17’s suitability, availability, and deliverability, being an optimum and sustainable location for high-quality residential development.</p>
<b>Attachments</b>	<a href="#">1340848 Araripe Limited.pdf</a>



<b>Comment ID</b>	NULLP1056
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>Policy PSD5 (Green Belt)</p> <p>3.21 Persimmon fully supports the proactive approach of the Regulation 19 Plan in recognising the need for Green Belt release. Permission also supports the position of the Regulation 19 Local Plan in establishing an inset boundary at Keele Village. The Seddon Homes Hawthorns development has demonstrably changed the character of the village to one whereby the presence of a washed over green belt would only serve to unnecessarily restrict and hinder future development. Establishing an Inset boundary allows for more agile planning decisions to be made, to the benefit of the Village as part of the wider settlement hub that is combined with Keele University.</p> <p>Safeguarded Land</p> <p>3.22 As part of the evidence base, ARUP has prepared a Green Belt Safeguarded Land Advice (Assessing the Need for Safeguarded Land) Report (July 2024). This assessment identifies a need for safeguarded land to retain flexibility in the Borough's supply without needing to further alter the Green Belt and to look beyond the Plan Period. The report considers the requirement and potential quantum of safeguarded land the NUL should consider in its emerging Local Plan, concluding that it is "recommended that safeguarded land sufficient to accommodate between 1,562 and 2,342 dwellings is identified".</p> <p>15</p> <p>3.23 The Regulation 19 Local Plan remains silent on addressing this advice or in identifying any safeguarded sites. Persimmon would urge the Council to respond to this advice prior to the Local Plan progressing to submission stage, and as an absolute minimum, identify safeguarded land that retains flexibility to:</p> <ul style="list-style-type: none"> <li>• Meet housing needs throughout the entirety of Plan Period, particularly in the context of planning reform and proposals to significantly increase the Borough's housing requirement.</li> <li>• Address any under delivery in the Borough's strategic allocations, particularly its large scale or brownfield land allocations.</li> <li>• Respond to macro-economic change, employment growth and other patterns that may affect demographic change or a change in need.</li> </ul> <p>3.24 Persimmon fully supports the need to safeguarded land to future-proof the emerging Local Plan and meet longer-term development needs. Safeguarding land will mean the Council has increased agility when responding to future demand, particularly in light of the NPPF changes and policy landscape being proposed by the new Government. This is especially critical in the University Growth Corridor where there is significant evidence that development of the area could lead to exponential growth.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP1051
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>Policy PSD1 (Overall Development Strategy)</p>

3.2 Policy PSD1 sets a minimum housing requirement of 400 dpa or 8,000 units during the Plan Period. This strategy is in excess of the Government's current LHN calculation, which identifies a requirement of 330 dpa (which is welcomed), but significantly (48%) below the housing requirement proposed alongside the emerging NPPF and new LHN (593 dpa).

3.3 Persimmon has commissioned Lichfields, experts in analysing housing need, to undertake a "Housing Requirement Paper" that considers NUL's housing requirement in the context of its growth projections and the new NPPF – this is attached in full at Appendix 2. This in-depth analysis by Lichfields considers that, notwithstanding the proposed changes to LHN and the new NPPF, a requirement of 400 dpa does not fully address the economic growth prospects of NUL; nor does it meet the needs of all household groups as required by the NPPF. It is also significantly lower than the 593 dpa proposed by the Government's proposed changes to the Standard Methodology and LHN, as set out in Section 2, which should be considered a minimum, not a maximum, housing requirement.

3.4 Lichfields analysis sets out clear and compelling reasons why the Council should be more ambitious with its housing requirement and make provision for a greater level of housing than Policy PSD1 of the Local Plan currently provides for. These reasons are explored in full in Appendix 2 and include:

1. There is a misalignment at the heart of the Local Plan's strategy that must be remedied by an uplift to the housing requirement, as the employment land target of 63 ha would generate a significantly higher number of jobs than could be sustained by the 400 dpa housing target. Furthermore, the Council's forward supply of employment land is not 63 ha, but at least 104.6 ha. Persimmon respectfully requests that further information is provided by the Council as to the actual level of employment land supply it is providing for and what this would mean for additional job growth/housing need.
2. Whilst the Council argue that not all of these new jobs from the strategic employment sites will be taken up by local residents requiring new housing in NUL, no agreement is in place with any of NUL's neighbouring authorities to take on board any of its unmet need for in-commuters;
3. The proposed new housing requirement would see NUL's housing need increasing from 330 dpa to 593 dpa. This figure is also 48% higher than the emerging Local Plan figure of 400 dpa and is indicative of a radical change in housing policy from the new Labour Government that represents a very clear direction of change. NUL should consider adopting the new housing requirement to fully plan for its need across the Plan Period – recognising the significant implications it could have once the Local Plan is more than 5 years old (as discussed in the previous section). It also poses serious questions as to how the new requirement could be accommodated across NUL's wider HMA, which includes Stoke on Trent's significantly higher housing number of 1,043 dpa. Further work is required to understand the housing implications of strengthened cross boundary strategic planning across the HMA. Closer working and potentially, an acknowledgement by NUL Borough Council that it could take some of Stoke on Trent City's high level of unmet housing need would be beneficial.
4. The Council's evidence base points to an acute need for affordable housing within the Borough, with the net affordable housing need equating to 278 dpa, or c.70% of the annual dwelling growth required by the Council's Housing and Economic Needs Assessment ("HENA"). A higher housing requirement, and deliverable / viable sites, are necessary to help deliver as much of these affordable housing needs as possible.
5. There is a need for 15-16 care home bedspaces per annum as well as an annual need for 32 units of sheltered accommodation p.a.; 5 enhanced sheltered homes annually; and 6 additional Extra Care homes p.a. No provision is made in the emerging Local Plan to meet this C2 need, which should be additional to the C3 housing requirement of 400 dpa.
6. The 400 dpa housing requirement figure makes no allowance for Keele University's expansion plans to 2040. The University aims to increase its student numbers by 6,795 between 2022 and 2040, but only has plans for an additional 1,300 student rooms on campus. There should be at least 500 additional C3 dwellings (25 dpa) provided in NUL to address increased student demand.

3.5 In conclusion, Lichfields identify that NUL meets a number of the circumstances identified in the PPG which justify a housing requirement figure in excess of the minimum LHN, and indeed the 400 dpa recommended in the HENA and taken forward in the emerging Local Plan. In this context and in the context of new Government policy, Persimmon strongly requests that the Council revisits its housing and employment evidence to address the points identified above and to ensure that it robustly and holistically plans for its housing requirement across the Plan Period.

3.6 Adopting an approach that will not meet NUL's future housing needs will not adequately recognise the role of Newcastle-under-Lyme as part of the wider joint housing and economic area within Stoke-on-Trent (or the wider HMA); where there has been evidence of considerable growth and higher delivery than predicted.

3.7 Persimmon supports a positive economic strategy that elevates the Borough's aspirations for growth. The Local Plan provides a generational opportunity to support the sustainable growth of the Borough by providing the quality and quantity of housing and employment land that can catalyse jobs growth and improve the performance of the Borough, whilst supporting the wider needs of the region under DtC and supporting the new Government's bold approach to addressing the UK housing crisis

<b>Q7 Modification</b>	Persimmon strongly requests that the Council revisits its housing and employment evidence to address the points identified above and to ensure that it robustly and holistically plans for its housing requirement across the Plan Period.
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP1055

<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>Policy PSD3 (Distribution of Development)</p> <p>3.11 The Regulation 19 Plan identifies a distribution of development which directs 800 new homes towards the Keele and Keele University settlement. In line with the above comments regarding the Settlement Hierarchy, whilst Persimmon welcome a greater apportionment to Keele and Keele University Hub (increased from 600 homes to 800 homes from Regulation 18 to Regulation 19), we consider that it is capable of accommodating a greater level of housing growth which will catalyse regional economic growth.</p> <p>3.12 Ambitions in both the 'NULBC's Strategic Economic Development Strategy' and the 'New Deal for Newcastle-under-Lyme 2019-2023' seek to double the SIP and provide over 7,000 FTE jobs by 2040 while "significantly raising the number of new houses built each year", demonstrating the capability of Keele and Keele University to accommodate significant growth. The identification of 800 new homes in Keele is therefore not sufficiently ambitious, and could miss a significant opportunity to realise the University growth corridor and its potential for delivering housing, employment, and economic growth. Notwithstanding this, as explained below, the supply identified to meet this need predominantly comprised of student accommodation; which will not provide the market or affordable housing to support this economic growth or the development of the University Growth Corridor.</p> <p>Housing Supply in Keele</p> <p>3.13 The Site Selection and Assessments Report (2024) identifies 587 commitments and completions within the Keele and Keele University settlement, which are included as part of the emerging Local Plan's claimed supply, leaving a 'residual' need for 213 units to meet the identified need of 800 units during the Plan Period. A large majority of the 587 commitments and completions are primarily claimed from the following two sites:</p> <ul style="list-style-type: none"> <li>• KL16: Pepper Street, Keele – this site was originally granted reserved matters permission for 100 dwellings in August 2018, and has subsequently received reserved matters consent. An update from the SHELAA (2024) states that "the site is under construction as of June 2024".</li> <li>• KL28: Horwood Hall, Keele University – this campus site was granted approval for the demolition of 732 student bedspaces, and erection of 1,706 student bedspaces at 12 Horwood Hall within the Keele University campus. The Council's housing trajectory in the SHELAA (2024) is claiming this as 406 dwellings (from the 973 net additional bed spaces) in the housing supply / commitments.</li> </ul> <p>3.14 The Regulation 19 Plan proposes to allocate two sites in the Keele and Keele University settlement. These both support the ambitions of the University and the University Growth Corridor, which Persimmon fully supports; however, neither offer any contribution to meeting the market or affordable housing needs that would support this growth. These include:</p> <ul style="list-style-type: none"> <li>• KL13: Keele Science Park Phase 3 – the site has an extant planning permission for mixed-use development. The SHELAA (2024) states that "The site has planning approval for mixed use development for employment and academic purposes with some student residence (Ref. 17/00934/OUT &amp; 20/00162/REM). Site promotion includes provision of approximately 220 units of student residential accommodation in addition to employment use". The extant permission (Ref. 17/00934/OUT) confirms that the consent is for student and university staff accommodation and does not provide consent for market or affordable housing – condition 6 of that permission states "6. The occupation of the residential accommodation hereby permitted shall be limited to persons who are either students or delegates at the University or members of University staff".</li> <li>• KL15: Land South of A525 – Policy KL15 states "Land south of the A525 Keele is allocated for residential and employment development including 260 dwellings for student accommodation and 13 hectares of employment land". The site will therefore also deliver no market or affordable housing.</li> </ul> <p>3.15 Based on the above, Persimmon has significant concerns with the Council's approach in claiming its housing supply from large numbers of student residences especially while there is no clear evidence of how this is applied as part of the overall housing requirement or supply.</p> <p>In relation to demand and supply in Keele, Persimmon makes the following comments:</p> <p>Housing &amp; Student Requirement</p> <p>3.16 As set out in Lichfields Housing Requirement Paper at Appendix 2, the Council's 2023 HENA and 2024 HENA Update make it explicitly clear that the proposed growth of the</p>

University has not been taken into account in the calculation of the Borough's Housing requirement. Paragraph 8.34 of the 2023 HENA confirms this, stating that [Asteer 13 emphasis added]: "As with the earlier modelling presented in the HNA, the demographic projections introduced in this report continue to principally allow for indigenous growth amongst residents of traditional student age, meaning that a significant growth in the student population could generate an additional need for housing that is not explicitly taken into account. The HNA recommended that the Council maintains a dialogue with Keele University to ensure that its plans for investment, and specifically the anticipated allowance for additional student numbers in the plan period, are fully understood and the update above reaffirms why this will be necessary". As set out by Lichfields, there is no evidence that engagement with the University has been undertaken or that student need has been addressed. They anticipate that student demand will generate a need for the equivalent of an additional 25d dpa in NUL, and specifically in the Keele corridor, which has not been addressed.

#### Housing Land Supply

3.17 Persimmon has significant concerns with the housing supply land position in Keele. Of a total of a total of 587 units claimed in the supply of 'committed' sites in Keele, a large majority of these are at Horwood Hall - with 406 residential units claimed in housing commitments from an on-campus student development for 1,706 replacement student bedspaces.

3.18 In terms of future supply in Keele, 220 units are allocated at site KL13 and 260 units are allocated at site KL15 – both of which are student accommodation only development, as explicitly stated in the Regulation 19 Plan. This means that:

- The largest source of supply in the committed sites in Keele and the University Hub comprises student bedspaces at Horwood Hall.
- The proposed allocated supply in the Keele and Keele University settlement is entirely student accommodation, at sites KL13 and KL15 – and therefore no market or affordable housing is proposed to be allocated during the Plan Period in Keele and the University Hub.
- As set out by Lichfields, the HENA and Local Plan does not factor in student growth or accommodation needs. It is therefore likely that the student accommodation proposed will merely support some of the growth needs of the University – leaving a residual and severe lack of market and affordable housing in Keele to meet the proposed housing requirement.

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- Only site KL16 (Pepper Street - 100 units) and other windfall / commitments (though it is unclear in the evidence base where or what these are) have the potential to deliver any non-student residential accommodation in Keele and the University Hub.

3.19 Based on the above, there will be very limited high quality market or affordable housing brought forward in the Keele and Keele University settlement during the Plan Period (including no allocations), which will significantly impact on the growth of the University corridor and the ability of employment generators, such as the SIP, to attract and retain staff in the University Growth Corridor.

3.20 Persimmon considers that the Regulation 19 Plan does not adequately meet its housing needs, particularly in the settlement of Keele and Keele University, which relies heavily on a claimed supply of student accommodation (compared to a housing requirement that does not consider University or employment growth). As a minimum, the Council should revisit its housing evidence base in the context of emerging national policy, the growth of Keele University and the need to provide a deliverable supply of market and affordable housing to support the University Growth Corridor.

<b>Q7 Modification</b>	Please see attached representations
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP962
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	Please see attached representations. Persimmon supports the largest proportion of the Borough's identified need being directed to Newcastle-under-Lyme (5,200 homes), in line with its role as the Strategic Centre at the top of the settlement hierarchy. The site is also in a location that can support the westwards expansion of Newcastle-under-Lyme, which will support Keele University as an internationally recognised institution and support a University Growth Corridor by delivering the type and quality of homes that will underpin growth on the western urban edge of Newcastle-under-Lyme.

<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1305703 Persimmon Site TB23 (Galingale).pdf</a>
<b>Comment ID</b>	NULLP1060
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>c) Other Proposed Allocations in Keele</p> <p>4.46 Persimmon is fully supportive of the proposed University site and strategic allocations in Keele, which include:</p> <ul style="list-style-type: none"> <li>• KL13: Keele Science Park Phase 3 – which has an extant planning permission for mixed-use development, including University buildings and student accommodation; and</li> <li>• KL15: Land South of A525– which is a University site, supporting further employment development and student accommodation at the University.</li> </ul> <p>4.47 These allocations are critical to Keele University and its SIP, and offer a generational opportunity for regional scale growth – which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy. This must include the release of further land in the University Growth Corridor for high quality and accessible new residential (market and affordable) development, to support</p> <p>35</p> <p>the attraction and retention of employees, academics and future graduates as part of a mixed sustainable settlement for the Borough.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP963
<b>Order</b>	233
<b>Title</b>	Policy TB23 Land West of Galingale View, Thistleberry
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB23
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>Policy TB23 of the Regulation 19 Plan sets out the policy requirements for the delivery of the site, and is shown on the Regulation 19 Policies Map</p> <p>The site is identified as being within Thistleberry, which is part of the Newcastle-under- Lyme Strategic Centre – the top tier of the settlement hierarchy. It is identified to accommodate approximately 124 units. The masterplan at Appendix 1 demonstrates a deliverable scheme that considers the site constraints and a high quality design, could</p> <p>accommodate approximately 103 units – however, Persimmon support the proposed site capacity in the Regulation 19 Plan and could deliver the mix and type of product (i.e. at a slightly higher density) that could deliver 124 units on the site.</p> <p>Persimmon strongly support the draft allocation of the site and, as demonstrated in the Vision Document attached as Appendix 1 and summarised in the next section; we consider the site to be fully deliverable and wholly suitable for allocation in the emerging Local Plan.</p> <p>The detailed draft requirements for the site are set out under Policy TB23. Table 1 below (see attachment) provides Persimmon's comments and proposed modifications to each requirement:</p>



Satisfactorily addressing the allocation requirements set out in Policy SA1 (General Requirements) - Persimmon's comments on the relevant parts Policy SA1 (General Requirements) are provided in Table 2.

2. No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026 - Persimmon support this requirement and would not look to commence any development prior to this date, after which the quarry will be capped.

3. Primary access to the development being via Galingale View, secondary access via Rosemary Hi and Barnacle Place - Persimmon fully supports this policy requirement, with access to the site from these highways being fully demonstrated in the Vision Document at Appendix 1 (see attachment).

4. Submission of a coal mining risk assessment, mitigation strategy and development to be located outside the coal mining development high risk zone, the extent of which will be defined by the submitted coal mining risk assessment - Persimmon generally supports this policy and makes the following comments: A Coal Mining Risk Assessment has been undertaken by Wardell Armstrong that confirms that there is no history of shallow coal mining, surface hazards or mine entries within the site. There is also no current or future proposed extraction of coal, by underground methods, and the site is not within 200m of surface mining where coal is being removed. The Apedale fault is recorded to cross the site, trending NNW – SSE, and the Coal Authority define a thin linear zone incorporating the fault as a Development High Risk zone. This designation is because the Apedale fault has reactivated during and after the cessation of mining activities. Notwithstanding this, bearing in mind that mining ceased in 1988, the risk associated with the future reactivation of this fault generating future ground subsidence is considered low to negligible. It is best practice to avoid building directly over/adjacent to significant geological faults where possible and the design ensures that a "no build" zone has been incorporated into the illustrative masterplan. Based on the above and for policy clarity, Persimmon consider that the extent of the coal mining risk zone should be informed by the Coal Mining Risk Assessment and our proposed modification to this policy requirement is shown across in red.

5. Submission of a land contamination assessment, odour assessment and associated mitigation strategy in relation to the impact of Walleys Quarry. Persimmon supports this requirement and would submit undertake a detailed assessment of land contamination and odour as part of a detailed planning application.

6. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding - The site is located in Flood Zone 1. However, a Flood Risk and drainage assessment will be submitted as part of a detailed planning application to ensure that any surface water drainage from the development will be fully assessed and could be adequately managed via Sustainable Urban Drainage Systems ("SuDS").

7 The enhancement of the existing Public Rights of Way and Green Infrastructure Network - There are no public rights of way on or adjacent to the site; however, as part of a detailed planning application for the site, persimmon will seek to enhance permeability and green infrastructure across the development.

8. Financial contributions to improvements in the capacity of local schools and health facilities - Whilst Persimmon does not object to making contributions to education and health, it is important that any requirements for contributions are fully justified and evidenced both in the Local Plan and at the application stage. Persimmon would seek to reserve the right to comment on any further evidence or discussion in relation to the need for education or health that is submitted prior to or during the Local Plan at Local Plan Examination.

#### Comments on Policy SA1 general requirements

1. Strategic Considerations -Masterplans - Persimmon consider this requirement to be unnecessary and onerous. A masterplan would be submitted as part of a planning application for the site (illustratively if in outline) to demonstrate how the site could be brought forward. It should be made explicitly clear that any masterplan does not need to be submitted or agreed in advance of any application – which would cause considerable delay to any development being brought forward.

2. Affordable Housing - The Policy requires 30% affordable housing on greenfield sites. In accordance with Policy HOU1 (Affordable Housing), Policy SA1 should make it explicitly clear that the affordable housing requirement can be subject to a robust viability assessment where this level of affordable housing cannot be delivered

3. Housing Density, Mix and Standards - Persimmon supports residential development delivering an appropriate mix of housing and densities in line with Policy HOU2, which requires sites within the strategic centre of Newcastle-under-Lyme to achieve a net density of around 30-50 dwellings per hectare. The supporting text to HOU2 recommends that, in terms of type of market housing, 75-80% should be provided as houses and 20-25% evenly split as bungalows and flatted units. Whilst this is not including in the policy wording, Persimmon would object to any prescriptive application of housing type on the Local Plan allocations. Persimmon consider that applying this to its allocations could render a significant number of sites unviable and undeliverable.

4. Design (including sustainability and energy efficiency) - Persimmon generally supports the Local Plan approach to design and sustainability. However, it is important that where specific requirement are imposed (such as M4[2] and M4[3] accessibility thresholds), that the requirements are fully evidenced, justified and viability tested. HOU3 (Housing Standards) requires 10% of market homes to be built to M4(3)(a) and 10% of affordable/social rented homes to be built to M4(3)(b). This is a significant % figure and should be fully evidenced and viability tested. There should also be flexibility in its application, particularly in terms of viability, to ensure that sites are not rendered unviable. Persimmon would seek to reserve the right to comment on any further evidence or discussion in relation to the viability of design policies or the viability testing of the Local Plan at Local Plan Examination.

5. Social and Community Facilities - In line with our comments above, it is important that any requirements for contributions are fully justified and evidenced both in the Local Plan and at the application stage.



#### Supporting Evidence

3.5 The Council's evidence base supports the allocation of the site and provides a sound basis for its inclusion in the Local Plan. The recently published Site Selection Report (2024) considers that the site is "available", achievable and "viable", and therefore suitable for residential development. The summary proforma for the site states that: "The site is located within the Newcastle urban area, and promoted for housing development and open space. The land is flat and is in close proximity to existing residential development. It is also close to Walley's Quarry which could raise amenity concerns. A small part of the site within the eastern boundary is identified as high quality / low value Natural and Semi-Natural Greenspace in the Open Space Strategy 2022. The developable area takes this into account. Flood zones 2 and 3 are confined to a very small area within the north-western boundary. Developable area calculation takes both of these into account. The site has access to some services and facilities. Access points along Galingale View. The site is considered to be available, viable and suitable for allocation in the Local Plan Taking into account and balancing the range of factors considered in the SSM and summarised above, alongside the outcomes of the Sustainability Appraisal / Habitats Regulations Assessment and relevant evidence base it is recommended that this site is included as an allocated site in the Local Plan subject to appropriate policy wording<sup>1</sup>".

Persimmon supports this site assessment and has demonstrated how any site considerations can be mitigated as part of its Call for Sites submission and Vision Document (submitted in November 2022 and attached as Appendix 1). The following section provides a summary of the deliverability of the site.

#### LAND TO THE WEST OF GALINGALE VIEW: A DELIVERABLE SITE

##### Site Context and Location

The site is located in within the settlement boundary of the Strategic Centre of Newcastle-under-Lyme and sits within a western corridor that stretches to Keele University, its Science Innovation Park and the village of Keele.

The site is characterised by a linear parcel of low value grassland, set within an urban context, that naturally links into the existing and successful developments at Milliners Green and The Hamptons, which were built to support development on the western edge of Newcastle-under-Lyme in the mid-2000's. To the west of the site is the Walleys Quarry Landfill site, which is due to enter a phase of remediation where it will be ultimately reclaimed by nature, following the adoption of the Local Plan.

The site is sustainably located with excellent transport connectivity, with immediate access to the A525, and is accessible via regular bus services to Newcastle-under-Lyme, Stoke, Crewe and Nantwich. Stoke-on-Trent train station can be accessed via bus and provides up to 9 services an hour to destinations such as Manchester Piccadilly, Crewe, Birmingham New Street, London Euston, Derby and Bournemouth.

##### Deliverability

The site offers an opportunity to bring forward a deliverable site that can deliver a range of economic, social and environmental benefits. It is in a highly accessible location that will support a sustainable pattern of development within the Strategic Centre, underpinning the growth of the town centre and key employers in the west, such as Keele University and its Science Innovation Park.

The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

Persimmon is fully committed to the site and considers that it could be brought forward in the Local Plan period to meet the housing and employment needs of the Borough. In summary the site is:

##### Available

Persimmon has control over the entire site and has the track record in housing delivery to bring forward the site early in the Plan Period. Persimmon is a hugely experienced housebuilder and has an extensive track record in delivering a diverse range of highquality new housing developments across the UK.

##### Suitable

The site is entirely suitable for a residential development for the following reasons:

- It offers a highly accessible and sustainable location for development within the Newcastle-under-Lyme settlement boundary.
- It would contribute to a sustainable pattern of development as part of the Strategic Centre and is strategically located to support key employers on the western edge of the town, such as Keele University.
- It is within proximity to a range of services and facilities.
- The site has been assessed in the Council's 2024 SHELAA, which forms part of the evidence base for the emerging Local Plan, and is considered to be "developable".
- As part of its Vision Document, Persimmon has undertaken a comprehensive range of technical and environmental assessments to demonstrate that there are no environmental or technical constraints that would prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.
- The site can deliver satisfactory vehicular access and has excellent access to the strategic highway network.

##### Achievable

An indicative masterplan has been developed that demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led, deliverable masterplan. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts has been retained to support the detailed design of the site moving forward.

Persimmon has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in NUL; as well as the cost factors associated with the site including site preparation costs and site constraints. The market attractiveness of the location has been demonstrated by Persimmon's successful developments at the Hampton's and Milliners Green. Persimmon can confirm that the development of the site is economically viable in accordance with the NPPF.

##### Significant Benefits

	<p>The allocation and subsequent delivery of this underutilised site will have significant benefits for the Borough, through the delivery of the quality and type of market and affordable housing that will meet its needs. Economic Benefits</p> <p>The allocation and delivery of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits include:</p> <ul style="list-style-type: none"> <li>• Generating investment during the construction phase of development, including to generate a total construction investment of £17.8m which could create 116 direct Full Time Equivalent ("FTE") jobs and 158 indirect/induced jobs.</li> <li>• Long term occupation / operational benefits including new resident expenditure, attracting new and high earning residents to NUL, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.</li> <li>• Generating revenue for the Local Authority of at least £143,000 per annum in Council Tax revenue, £570,000 in New Homes Bonus (over 4 years) and more than £515,000 in Section 106 contributions.</li> </ul> <p>Social Benefits</p> <p>The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. Key social benefits include:</p> <ul style="list-style-type: none"> <li>• Delivering high quality market homes to meet the needs of the Borough's existing and future employees.</li> <li>• Providing viable and deliverable affordable homes to address the Borough's affordability crisis and to support the housing of graduates, key workers and other first time buyers.</li> <li>• Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents and to improve connectivity.</li> </ul> <p>Environmental Benefits</p> <p>The site is currently of limited biodiversity or recreational value. The development of the site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:</p> <ul style="list-style-type: none"> <li>• An uplift in the biodiversity value of the site through Biodiversity Net Gain. The site will create new habitats for a range of species and provide an uplift in biodiversity that meets Government targets.</li> <li>• The provision of multi-functional green infrastructure and open space that will benefit existing residents and create new green corridors through the site.</li> <li>• The protection and enhancement of existing features of the site that add value, including mature tree belts.</li> <li>• The implementation of cutting edge net zero technologies which are being rolled out by Persimmon through the design, construction and operation of new homes.</li> </ul> <p>In summary, Persimmon fully supports the allocation of site TB23 (Land West of Galingale View). The site is in a highly accessible location and will provide the quality, type and mix of homes that will support growth on the western edge of the Newcastle-under- Lyme Strategic Centre, underpinning the growth of key regional employers such as Keele University and the Keele University Science and Innovation Park. As has been demonstrated in these representations and Persimmon's submission to the Council's Call for Sites, that the site is inherently deliverable: being available, suitable and achievable in the context of the NPPF. Furthermore, the site can deliver significant economic, social and environmental benefits on an underutilised site that forms a natural and logical extension to Persimmon's successful developments at Milliners Green and The Hamptons.</p> <p>Persimmon would welcome ongoing engagement with the Council as the Local Plan progresses to Examination and has a team of technical and professional experts on hand to fully underpin the allocation of this site.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1305703 Persimmon Site TB23 (Galingale).pdf</a>
<b>Comment ID</b>	NULLP961
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	Please see attached representations. Persimmon supports the identification of Newcastle-under-Lyme as the Borough's "Strategic Centre", which sits at the top of the settlement hierarchy and is therefore a focus for growth in the Borough. Persimmon supports the identification of the site within the Strategic Centre, recognising the potential of the site to contribute to meeting the housing needs of the Strategic Centre on a vacant and underutilised site.
<b>Q7 Modification</b>	Please see attached representations.

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1305703 Persimmon Site TB23 (Galingale).pdf</a>
<b>Comment ID</b>	NULLP1058
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>b) Lyme Park / Former Keele Municipal Golf Course: Site Assessment</p> <p>4.16 Given the proximity of the proposed allocation at the Lyme Park (Site SP11 – including parcels SP11[1], SP11[2], SP11[3] and SP11[4]) and its potential to have significant impacts on the Green Belt, biodiversity, and Keele Village and the University, it is important that the Council fully considers the impact of allocating this site. This section provides:</p> <ul style="list-style-type: none"> <li>i. A review of the proposed site allocation and a critique of the evidence base that underpins the Council's selection of Site SP11;</li> <li>ii. An assessment of the site constraints, considering potential adverse impacts.</li> </ul> <p>i. Proposed Site Allocation and Evidence Base</p> <p>Proposed Site Allocation</p> <p>4.17 Site SP11 (Former Keele Municipal Golf Course) is identified:</p> <ul style="list-style-type: none"> <li>• Within the NUL Strategic Centre (Silverdale);</li> <li>• As a site that is disaggregated into 4 land parcels, with a capacity for 900 dwellings, including: <ul style="list-style-type: none"> <li>- SP11 (1) – Keele Square – a development of 255 homes, a local centre, including a health centre, to meet local needs and a 1 form entry Primary School, including an attractive public realm accessed from a new spur from A525 Keele Road / University Avenue roundabout.</li> <li>- SP11 (2) – Keele Woods – a development of 310 homes accessed from A525 Keele Road.</li> <li>- SP11 (3) – Ashbourne Drive – a development of 235 homes accessed from Ashbourne Drive.</li> </ul> </li> </ul> <p>22</p> <ul style="list-style-type: none"> <li>- SP11 (4) – Park Road – a development of 100 homes accessed from a new road from the junction of Race Course and Park Road to the north east of the site. For SP11(4) no dwellings will be occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026.</li> </ul> <p>4.18 Persimmon makes the following overarching comments:</p> <ul style="list-style-type: none"> <li>• The site is identified in the Strategic Centre, however, we note that the site would also have a very significant impact in the Keele and Keele University settlement – effectively merging this settlement with the strategic centre at Silverdale.</li> <li>• The site has significant constraints which are not fully considered in the evidence base or the Regulation 19 Plan. These are considered in more detail later in this section.</li> <li>• Site SP23 (Land at Cemetery Road / Park Lane) is a smaller allocation that would also not be logical or deliverable without the release of Site SP11 from the Green Belt.</li> <li>• The Council's Sustainability Appraisal provides no further justification for why this site is selected compared to other sites, such as Quarry Bank Road (this is discussed in more detail in Section 5).</li> </ul> <p>Evidence Base &amp; Site Selection</p> <p>Site Selection Report (2024)</p> <p>4.19 The Former Keele Municipal Golf Course / Lyme Park is identified as Site SP11 in the Site Selection Report (which draws on the SHELAA and Green Belt Assessment), with a capacity for 900 homes (using an applied density of 50dph) and is identified as available, achievable and viable – and suitable for residential development. The summary for the site states:</p> <p>“A Green Belt site promoted for housing development. Part of the site is identified in the Open Space Strategy 2022 with three typologies. This includes Amenity Greenspace (approximately 3.1ha), Natural and Semi-Natural Greenspace (approximately 3.1ha), and Provision for Children and Teenagers (0.4ha). A Biodiversity Alert Site (Bogs Wood) and Regionally Important Geological Structure (Job's Wood Quarry) is on site. Developable area calculation takes this into account. A Biodiversity Alert Site (Redheath Plantation) adjoins the western boundary. Keele Hall Registered Park and Gardens is in very close proximity to the site to the south. The site has access to services and facilities. Estimated potential capacity calculation derived from the previous masterplan</p> <p>23</p>

exercise as part of the Keele University Growth Corridor. Mineshaft and mature trees on site. The site has access to a range of services and facilities.<sup>4</sup>”

4.20 This assessment highlights significant site constraints and displays no clear rationale for the selection of the site, when compared to other sites. Furthermore an earlier version of the SHELAA (2022) considered the site and it was identified as a ‘Site not in Deliverable & Developable Supply’ and assessed as follows:

(Table available in attachment)

4.21 It is unclear how or why the site has ultimately been selected by the Council based on the SHELAA, Site Selection Report or Sustainability Appraisal (which is discussed in more detail later).

Green Belt Assessment (Part 4, 2024)

4.22 The site is identified as ‘Former Keele Municipal Golf Course’ (Site Ref: SP11A). The 2024 Green Belt Assessment (“GBA”) provides a review of the site, which is summarised below:

(Table available in the attachment)

The assessment concluded:

“The site makes a moderate contribution to Green Belt purposes. Development would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Newcastle-under-Lyme. Development would entail an incursion into undeveloped countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along the strong permanent southern boundary of the A525 Keele Road. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt. A new recognisable and permanent Green Belt boundary would be created consisting of the A525 Keele Road to the south, a small section of Redheath Plantation and dense wooded areas to the west, and through strengthening the remainder of the western boundary. It is recommended that if the site is taken forward the accompanying policy should recognise this.<sup>5</sup>”

4.24 Persimmon considers that this assessment is fundamentally flawed in its conclusions. Quite clearly the allocation and development of the site would effectively merge together Silverdale (which forms part of the strategic centre) with the new Rural Centre of Keele and Keele University, and have a significant impact on the purposes of the Green Belt. In line with our comments on KL21, the Green Belt Assessment has clearly not considered that Keele and Keele University as a new inset settlement which is not washed over with Green Belt in the emerging Plan. Therefore the Green Belt Assessment and the site selection process is fundamentally unsound.

4.25 The following table provides an assessment of the Council's 2024 Green Belt Assessment, alongside Persimmon's assessment of the purposes of the Green Belt.

(Table available in the attachment)

4.26 As a minimum, the Council must review the Green Belt Assessment of this site, which does not consider the identification of Keele and Keele University as a key settlement in the Borough, as proposed in the Regulation 19 Plan – or the effective merger of Keele and Keele University with the Strategic Centre at Silverdale. The impact of this merger of settlements is clearly shown in the Settlement Boundary Review Paper (July 2024), as shown below, which highlights how the strategic gap between Silverdale and Keele / Keele University will be completely eradicated

(Figure available in attachment)

Assessment of Former Keele Municipal Golf Course Site Constraints

4.27 Persimmon consider that the Council has not fully assessed, nor given sufficient weight to the significant site constraints that are inherent on Site SP11. The following provides a review of the key constraints that must be considered before the site is allocated in the Local Plan:

29

Highways

4.28 The traffic impact analysis undertaken for Quarry Bank Road (for 435 Units) has indicated that there is sufficient capacity on the surrounding highway network albeit with the mitigation at the A525 Keele Road/A525 Newcastle Road/A531 Crewe Road junction. The provision of 900 units on former Golf Course site would generate considerably higher levels of traffic on the local highway network and therefore require mitigation at junctions on the surrounding highway network.

4.29 There is limited scope for mitigation at the junctions in the vicinity of the site without requiring third party land, therefore, detailed assessment/analysis is required to demonstrate that the provision of circa 900 units can be accommodated on the network either with or without off-site highway works.

Ecology and Trees

Ecology

4.30 A Preliminary Ecological Appraisal was undertaken at Keele Golf Course by Ostara Ecology, which comprised of an online desk study, Phase 1 Habitat Survey, and an ecological scoping survey which assessed the potential of the site to support species which could present a constraint to development.

4.31 The site has been unmanaged since 2014, and has subsequently re-vegetated. This revegetation of the land has facilitated the growth of extensive areas of significant ecological value within the site. This includes 23.44ha of UK BAP priority habitat deciduous woodland with Ancient Woodland indicators, spread throughout the site. The site therefore serves as the ideal habitat to support an abundance of flora and fauna, and if further botanical surveys classify these areas of the site as ancient woodland, it would

designate this as an irreplaceable habitat.

#### Ecological Designations

4.32 The streams and wider sites could be sensitive to hydraulic changes. A detailed statutory designated sites assessment up to 10km will be required to ascertain the National Context of the site along with a Habitat Regulations Assessment.

30

4.33 Within the site is 'Bogs Wood', a Biodiversity Alert Site and 'Job's Wood Quarry' which is identified as A Regionally Important Geological Structure. Adjoining the western boundary of the site is another Biodiversity Alert Site 'Redheath Plantation'. These clearly identified areas of ecological sensitivity are not fully considered in the 2024 GBA and have not been transparently assessed by the Council based on published evidence.

(Figure available in attachment)

4.34 The baseline field survey confirmed the presence and potential presence of a number of species which all pose a high risk to development, and require further assessment/mitigation prior to the commencement of works. These are as follows:

(Table available in attachment)

4.35 The above table shows that development of the site could result in significant damage to a wide array of protected habitats, plants, and animals. Development of the scale and nature proposed cannot be viewed as sustainable, and would likely result in irreparable damage to the species and habitats affected.

4.36 The cumulative impact from the assessment, mitigation, and, known and unknown constraints resulting from the presence of these protected categories is a significant constraint on the deliverability of the site. We consider that the site has significant ecology value and does not represent a suitable or sustainable site for selection.

#### Trees

4.37 There are several groups of trees across the site including heavily wooded areas within the site, with TPOs located along the southern boundary of the site (Keele Road) and also along the north eastern boundary (Park Road). The 2024 GBA proforma notes the following in relation to TPOs:

"There are TPOs on or immediately adjacent to the site which could be accommodated within any development by sensitive design/layout – TPOs are located along the southern boundary of the site (Keele Road) and also along the north eastern boundary (Park Road) however development could avoid these".

#### Landscape & Visual

4.38 The site is within the Keele Ancient Redland Farmlands Landscape Character Area. The site is also identified under 3 typologies in the Open Space Strategy (2022) including Amenity Greenspace (approximately 3.1ha), Natural and Semi-Natural Greenspace (approximately 3.1ha) and Provision for Children and Teenagers (0.4ha).

4.39 The LCA describes the site as "land comprising woodland vegetation... the site slopes steeply down from approximately 195m AOD in the south of the site to approximately 140m AOD in the north of the site along the existing settlement edge. The woodland and open grass areas provide the backdrop to the existing settlement and separate it from the Keele University campus to the south". This provides further evidence that development would result in both encroachment on the countryside, and the merging of two settlements.

Development would also directly conflict the LCA Landscape Strategy which gives specific landscape guidelines for this character area type, stating to, "Conserve and enhance woodland on steep slopes". There are several Open Spaces adjoining the site, which are Open Space Sites: 380 Redheath Plantation; 453 Keele Cemetery; 144 Job's Wood; and, 140 Park Road Allotments around the edges of the site. The Open Space and Green

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Infrastructure Strategy designated the Open Space sites as either 'High Quality/High Value' or 'Low Quality/High Value'. The proposed actions for sites of these ratings are for the sites to be 'protected and enhanced'. Development of such a significant size as the one proposed at SP11 will likely result in damage to these areas of Open Space given the volume of inflows of people and the resultant increase in foot traffic.

4.40 Part 3 of the Landscape Character Assessment Study performed a site-specific assessment to judge the overall impact of developing the site. This assessment identified a number of 'potential significant adverse effects' including potential for:

- built form to intrude on undeveloped, wooded hillsides that are characteristic of this area and provide the backdrop to existing settlement;
- development to be viewed as a conspicuous, large scale urban extension across the steep sides of the wooded hillside that provides the backdrop to Silverdale;
- development to contribute to coalescence of the separate settlements of Silverdale and Keele University campus;
- loss of public footpaths and land with recreation value that would alter local recreational opportunities and links between the urban and rural areas;
- loss of woodland and trees that would alter the settlement backdrop, local sense of enclosure and remove vegetation links through the local landscape.

4.41 The Overall Appraisal then judged that, "larger residential development on this site would have a major adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well designed development which respects the local character and distinctiveness."

4.42 Ultimately, allocating the site will result in a significantly weakened Green Belt; remove a significant area of land with existing recreation value, limiting local recreational opportunities and links between the urban and rural areas; threaten a number of identified high-quality open spaces; and, cause 'major adverse impacts' to the landscape and local



	<p>character.</p> <p>Ground Conditions</p> <p>4.43 The GBA considers ground stability and mining activity, and states the following for site SP11: "Historic mining activities. Consultation with Coal Authority likely". There is limited further information with regard to this and it is unclear to what extent mining activity could</p> <p>34</p> <p>have been prevalent below ground, without specific investigation. This should be fully investigated by the Council prior to the allocation of the site.</p> <p>Summary of Site SP11</p> <p>4.44 Persimmon's assessment of the site demonstrates that the selection of Site SP11 is not sound, and the Council's assessment of the site and lacks transparency or rigour. Our assessment highlights that:</p> <ul style="list-style-type: none"> <li>• There is no clear rationale for the selection of Site SP11, and no justification to support its selection in the evidence base.</li> <li>• The Council's Green Belt Assessment is fundamentally flawed, not up to date and does not consider the impact of allocating SP11 on the proposed settlement of Keele &amp; Keele University or the wider countryside.</li> <li>• The site has significant technical and environmental constraints that have not been fully considered by the Council and which have not informed the site selection.</li> </ul> <p>4.45 Overall, Persimmon consider this site to be unsuitable for development and recommend that the Council consider it against the merits of Quarry Bank Road (Site KL21) – as set out in Section 5.</p> <p>(Comparative assessment of site 11 and KL21 available in attachment)</p>
<b>Q7 Modification</b>	<p>Please see attached representations</p> <p>The Council should fundamentally revisit its evidence base in relation to site selection, including its Green Belt Assessment and Site Selection Report in relation to Sites KL21 and SP11, in order to update these assessments, fully consider site constraints and to create transparency in the site selection process. The assessment process that has led to the allocation of site SP11 is contrived, lacks transparency and has no robust justification – which if carried through will require rigorous testing at Local Plan Examination.</p> <p>5. The Council should allocate Site KL21 at Quarry Bank Road, which offers an opportunity to bring forward a deliverable site early in the Plan Period that will support the growth of the University Growth Corridor and deliver a range of economic, social and environmental benefits on a site that will significantly contribute to meeting the needs of NUL. The site could provide 50% affordable housing, in line with emerging</p> <p>48</p> <p>national policy, that is aligned with the Borough's waiting lists in terms of product and tenure, providing the right times of homes for families, looked after children and older people.</p> <p>6. If Site KL21 is not allocated, as a minimum, the Council should consider safeguarding Site KL21, in line with the advice provided in the "Green Belt Safeguarded Land Advice Paper" to ensure that an adequate supply of market and affordable homes is held in reserve to meet the growth needs of the Borough and to be able to respond to the proposed fundamental shift in national policy.</p> <p>7.2 Persimmon would welcome ongoing engagement with the Council as a submission plan is prepared and has a team of technical and professional experts to underpin the merits of this site through to Local Plan examination. Any feedback, engagement or discussions in relation to this site can be arranged via Asteer, using the contact details below:</p>
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP960
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. Persimmon acknowledges that the Council's identified housing requirement (8,000 dwellings between 2020-2040) is a minimum requirement; however, would comment that the Council could consider a more ambitious level of housing growth during the Plan Period, to meet its needs, and to support the Government's emerging approach to catalysing housing delivery proposed in the draft National Planning Policy Framework ("NPPF") and updated Standard Method for calculating Local Housing Needs ("LHN"). Under-delivering on housing growth may not support the needs of the population, fail to meet the projected jobs growth in the Borough and not support the Council in fully meeting the emerging housing requirement throughout the Plan Period. Considering higher growth would:</p>



	<ul style="list-style-type: none"> <li>• Be in line with emerging policy proposed by the Government in the NPPF and proposed LHN for NUL, which proposes an LHN for NUL of 593 dwellings per annum (“dpa”) – which will increase NUL’s housing requirement from either 330 dpa using the current 2023 Standard Method for calculating LHN (a 263 dpa or an 80% uplift) or from 400 dpa based on the Regulation 19 Plan (representing an increase of 193 dpa or an 48% uplift).</li> <li>• Support jobs growth, as identified by the Housing and Economic Needs Study and Experian (“HENA” 2023 and 2024 Update), and deliver the labour force necessary to support job growth, particularly in catalyst areas such as the University Growth Corridor (including better accommodating student growth);</li> <li>• Assist in addressing affordability issues and deliver increased affordable housing; and</li> <li>• Better recognise the role of NUL as part of the wider joint housing and economic area with Stoke-on-Trent.</li> </ul>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1305703 Persimmon Site TB23 (Galingale).pdf</a>
<b>Comment ID</b>	NULLP1053
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>Policy PSD 2 (Settlement Hierarchy)</p> <p>3.8 Persimmon strongly support the identification of Keele and Keele University as a combined settlement location – identified as “Keele Village (with University Hub)” - however, this should be recognised commensurate to its role in the Borough, rather than sitting alongside the Borough’s “Rural Centres” in the settlement hierarchy.</p> <p>3.9 The Council’s Strategic Employment Site Assessment Report (SESAR) (2023) states, “[Keele’s] impact on the local and regional economy and the leading-edge research in key growth sectors, means that it has to be acknowledged as a regional strategic site”.</p> <p>Persimmon consider that the composition, uses and economic weight of the University, alongside Keele village, create a settlement that is geographically, economically and functionally different from other Rural Centres in the settlement hierarchy. Its identification as a Rural Centre does not reflect the need for this settlement area to provide the land and supporting uses to meet its long-term growth trajectory as part of the expanding University and its Science Park corridor.</p> <p>3.10 Persimmon consider that Keele and Keele University should be recognised as a location that supports the significant aspirations for growth and recognises the potential to fully link employment and housing growth in a sustainable way. Persimmon suggest that ‘Keele Village (and University Hub)’ is afforded a standalone position in the hierarchy of centres - as the “Keele and Keele University Growth Hub” – sitting above the Rural Centres and reflecting its role within University’s growth corridor and its once-in-a generation opportunity to form a new community where housing and economic growth is fully aligned.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP1057
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	KL21
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>a) Quarry Bank Road Site Assessment</p> <p>4.2 The Regulation 19 Plan does not identify Quarry Bank Road as a proposed allocation. In reviewing the evidence base, the following documents have been reviewed to critique how the Council has reached this conclusion:</p> <ol style="list-style-type: none"> <li>Site Selection Report and Assessments (2024) (underpinned by the 2024 SHELAA).</li> <li>Green Belt Assessment (2024).</li> </ol> <p>i. Site Selection Report (2024)</p> <p>4.3 Alongside the Regulation 19 Plan, the Council has published a Site Selection Report, which sets out the site selection process which has been applied to identify sites for development in the Local Plan; drawing on the assessment of sites undertaken in the SHELAA (2024). Land at Quarry Bank Road is identified as Site KL21 (Land South of A525 and either side of Quarry Bank Rd), with a capacity for 382 homes (using an applied density of 20dph).</p> <p>4.4 Site KL21 is identified as being “available”, “achievable” and “viable”, but is summarised as being “unsuitable” for residential development. The summary comments for the site state that:</p> <p>“The site makes a moderate contribution to Green Belt purposes, the site makes a strong contribution to preserving the setting of an historic town and a moderate contribution to preserving the countryside from encroachment. The Topography - land slopes upwards from Station Road and the A525. Impact on townscape of Keele 17</p> <p>Village conservation area (site adjacent to CA) &amp; setting of Grade II* listed building (St John the Baptist Church) and within the setting of Keele Registered Park and Garden. Limited part of site has Surface water flood risk (1 in 30 years). TPO on edge of site. The site is grade 3 agricultural land. The majority of the site is within minerals safeguarding area for brick clay. Some limited surface water flooding within site. The site is detached from the urban area / inset settlement.1”.</p> <p>4.5 Beyond the above assessment, there is limited information as to why the site was not considered further. Persimmon would make the following comments on this assessment:</p> <ul style="list-style-type: none"> <li>• The assessment does not consider in any detail how any impacts (such as heritage) can be mitigated. The Heritage Assessment detailed in the Development Statement provided at Appendix 1 demonstrates that the heritage impacts have been assessed and considered, and that in the context of adjoining development, the harm of developing the site would be less than substantial even before implementing any mitigation strategies, which would then further diminish the perceived harm. These strategies would include retaining views of the Church from the east, providing a buffer from the eastern parcel, and implementing considerate design techniques throughout.</li> <li>• The Green Belt Assessment is fundamentally flawed in relation to its assessment of the, in line with our comments below.</li> <li>• There are no definitive conclusions or reasons on why the site has not been selected, particularly when considered against other sites in the locality such as the Lyme Park / Former Keele Municipal Golf Course site (SP11) - the impact of which is considered later in this section.</li> </ul> <p>ii. Green Belt Assessment (Part 4, 2024)</p> <p>The Purposes of the Green Belt</p> <p>4.6 In terms of an assessment of the site against the purposes of the Green Belt, it was considered in the Council's 2024 Part 4 Green Belt Assessment (site KL21). A summary of the assessment for site KL21 is as follows:</p> <p>(Table available in attachment)</p> <p>concludes that the site makes a “Moderate” contribution to the purposes of the Green Belt and summarises that2:</p> <p>“The site makes a strong contribution to one purpose, a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to one purpose. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution. Although the site makes a strong contribution to preserving the setting and special character of historic towns, the site makes a moderate contribution to safeguarding the countryside from encroachment as it has predominantly durable boundaries and a strong degree of openness. These predominantly durable boundaries mean that development would be contained and would not compromise the overall openness and permanence of the Green Belt. The site does not contribute to checking unrestricted sprawl, it makes a weak contribution to preventing neighbouring towns from merging and a moderate contribution to assisting in urban regeneration.”</p> <p>2 Green Belt Assessment Part 4 (2024) – Assessment KL21A (pg.F.84)</p> <p>19</p> <p>4.8 Persimmon strongly objects to the assessment of Purpose 4 (preserving the setting and special character of towns). This should consider a more detailed assessment of the site's impact on the setting of the Keele Conservation Area. This has been undertaken by Persimmon as part of a Heritage Assessment and Landscape and Visual Assessment to underpin a review of the purposes of the Green Belt at the site, contained in its Development Statement at Appendix 1.</p> <p>4.9 Our assessment of Purpose 4 considers the site to have a “moderate” impact on this purpose. A Heritage Assessment, undertaken by Pegasus, has considered the setting of the Conservation Area and the impact of the development of the site on other designated</p>

	<p>heritage assets. It summarises that the sensitive development and masterplanning of the site could retain key views to key features of the Conservation Area and would cause “less than substantial harm” to its setting. In addition, the modern development at the Hawthorns and its inclusion within the Conservation Area boundary has introduced new development to the character of the Village and is particularly relevant to the character and interaction of the village to the North of Station Road / Keele Road, where the site sits.</p> <p>4.10 In addition, an arbitrary approach to Purpose 5 (assessing all sites as moderate) is flawed. The Council's urban capacity study and assessment of the exceptional circumstances for Green Belt release has demonstrated that the release of Green Belt land is not preventing urban regeneration. This purpose on all Green Belt sites should be “not applicable”.</p> <p>4.11 The Councils Green Belt Assessment conclusions for site KL21 also go on to state [Asteer emphasis added]:</p> <p>“The site is not considered to be suitable as it does not promote sustainable growth. The site is completely detached from the Keele University inset settlement which is approximately 200m away and from the Newcastle-under-Lyme urban area which is approximately 610m away. The site is adjacent to the washed over village of Keele. The site is available as it was promoted by the owner and it is not in active use and could be developed now. The site is considered to be achievable as it is broadly viable and there are no known abnormal development costs. The site has existing durable boundaries with the open countryside3”.</p> <p>3 Green Belt Assessment Part 4 (2024) – Assessment KL21A (pg.F.82 )</p> <p>20</p> <p>4.12 Keele and Keele University is now proposed to be a combined inset settlement (with the village of Keele no longer washed over by Green Belt). Therefore this assessment is fundamentally flawed and must be revisited by the Council to reassess the Green Belt impacts of site KL21 in this context. This issue was raised in our Regulation 18 representations in relation to the Part 2 and Part 3 Green Belt Assessment for site KL21, which has not been addressed, nor rectified in the Part 4 Assessment. The Green Belt Assessment in relation to Site KL21 is therefore fundamentally flawed and unsound.</p> <p>4.13 Our Development Statement at Appendix 1 provides an assessment of the purposes of the Green Belt in the context of Keele becoming an inset village. It concludes that the release of the site will create a logical, defensible and long term Green Belt boundary for a logically extended Keele Village and University hub, which does not have an adverse impact on the openness of the surrounding countryside and which is not required to meet the purposes of the Green Belt, as defined by the NPPF.</p> <p>Exceptional Circumstances for Green Belt Release</p> <p>4.14 Persimmon strongly supports the Council's Paper which sets out the Exceptional Circumstances for Green Belt Release (2023), which considers that there is a strategic case for release based on housing/employment needs, a lack of urban capacity and the need to promote sustainable patterns of development. We consider that it is clear that Green Belt release is required and that the site specific circumstances for release, including Green Belt impact should be a significant consideration in site selection.</p> <p>4.15 Quarry Bank Road is uniquely located to meet the needs of the Borough, within Newcastle's corridor of western expansion and within a settlement that includes Keele University. We consider that Quarry Bank Road can demonstrate the exceptional circumstances that exist at a site specific level, which should be considered alongside the strategic circumstances that support Green belt release, including (these are expanded upon in Appendix 1):</p> <ul style="list-style-type: none"> <li>• Meeting the needs of the University Growth Corridor and delivering sustainable patterns of development – spatially, the site is in a unique location to support the exceptional growth potential of Keele University and SIP.</li> <li>• New community infrastructure – as set out in the Illustrative Masterplan for Quarry Bank Road, the site has the scale and potential to support Local Plan growth through both an extension to St John's CE Primary School (or other community infrastructure) and a new convenience retail offer that will support new residents and the existing village of Keele (which does not currently have provision). The site also has the scope</li> </ul> <p>21</p> <p>to deliver other benefits where a need is established, such as an active travel hub to support Keele University.</p> <ul style="list-style-type: none"> <li>• Defensible boundaries and lack of contribution to the purposes of the Green Belt – as set out above, the site is self-contained and would provide defensible and permanent boundaries to the wider Green Belt and open countryside as part of Keele Village.</li> </ul> <p>(Comparative assessment of site 11 and KL21 available in attachment)</p>
<b>Q7 Modification</b>	<p>Please see attached representations</p> <p>The Council should fundamentally revisit its evidence base in relation to site selection, including its Green Belt Assessment and Site Selection Report in relation to Sites KL21 and SP11, in order to update these assessments, fully consider site constraints and to create transparency in the site selection process. The assessment process that has led to the allocation of site SP11 is contrived, lacks transparency and has no robust justification – which if carried through will require rigorous testing at Local Plan Examination.</p> <p>5. The Council should allocate Site KL21 at Quarry Bank Road, which offers an opportunity to bring forward a deliverable site early in the Plan Period that will support the growth of the University Growth Corridor and deliver a range of economic, social</p>

	<p>and environmental benefits on a site that will significantly contribute to meeting the needs of NUL. The site could provide 50% affordable housing, in line with emerging 48 national policy, that is aligned with the Borough's waiting lists in terms of product and tenure, providing the right times of homes for families, looked after children and older people.</p> <p>6. If Site KL21 is not allocated, as a minimum, the Council should consider safeguarding Site KL21, in line with the advice provided in the "Green Belt Safeguarded Land Advice Paper" to ensure that an adequate supply of market and affordable homes is held in reserve to meet the growth needs of the Borough and to be able to respond to the proposed fundamental shift in national policy.</p> <p>7.2 Persimmon would welcome ongoing engagement with the Council as a submission plan is prepared and has a team of technical and professional experts to underpin the merits of this site through to Local Plan examination. Any feedback, engagement or discussions in relation to this site can be arranged via Asteer, using the contact details below:</p>
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>
<b>Comment ID</b>	NULLP1061
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Company / Organisation</b>	Persimmon Homes (North West) Limited
<b>Agent Company / Organisation</b>	Asteer Planning LLP
<b>Agent Family Name</b>	Power
<b>Agent Given Name</b>	Jon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>Please see attached representations</p> <p>c) Other Proposed Allocations in Keele</p> <p>4.46 Persimmon is fully supportive of the proposed University site and strategic allocations in Keele, which include:</p> <ul style="list-style-type: none"> <li>• KL13: Keele Science Park Phase 3 – which has an extant planning permission for mixed-use development, including University buildings and student accommodation; and</li> <li>• KL15: Land South of A525– which is a University site, supporting further employment development and student accommodation at the University.</li> </ul> <p>4.47 These allocations are critical to Keele University and its SIP, and offer a generational opportunity for regional scale growth – which could provide a step-change in the Borough's employment offer that supports the knowledge-economy and which will significantly increase job numbers, job quality and job choice. However, the growth of Keele University and its Science Park must be supported by a sustainable spatial strategy.</p> <p>This must include the release of further land in the University Growth Corridor for high quality and accessible new residential (market and affordable) development, to support the attraction and retention of employees, academics and future graduates as part of a mixed sustainable settlement for the Borough.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q10 File 1</b>	6390600
<b>Attachments</b>	<a href="#">Jon Power.pdf</a>

<b>Comment ID</b>	NULLP898
<b>Order</b>	186
<b>Title</b>	Policy KS18 Land North of Lower Milehouse Lane, Knutton
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. KS11, KS17, KS18, KS19 – Knutton masterplan sites delivering a total of 73 affordable dwellings. Planning permission has recently been granted for KS11 and KS17 which would provide 75 affordable homes. Aspire does not control KS3, which is the other Knutton masterplan site, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP866
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. This policy seeks to direct most development towards the urban areas of Newcastle-under-Lyme and Kidsgrove with some more limited development to the rural centres.</p> <p>In general terms, there is no objection to the policy presumption to directing the most development towards the larger urban centres, however given the uplift that is required to deliver sufficient levels affordable housing to meet substantial need for this type of housing, it suggested that along with any uplift in the overall housing requirement as suggested in Chapter 4 above, whether or not some higher levels of growth should be directed towards the rural centres to enable the delivery of more allocations, and consequently, more affordable housing as part of the housing mix on such allocations. Housing is less affordable in the rural areas generally as well as around the rural centres, and directing some additional housing towards the rural settlements may facilitate the delivery of more affordable housing to meet local needs in these locations and would do so in a more plan-led way over and above ad-hoc applications for rural exceptions sites.</p> <p>It is also suggested that given that Audley and Bignall End has a wide range of local services and facilities, that perhaps a further uplift to the overall housing requirement for the Borough could be accommodated in this location (whilst the overall level of development elsewhere is maintained), as well as other sustainable urban fringe and rural locations around the Borough. In summary, it is the position of Aspire Housing that there should be more allocations than those currently proposed in order to provide an enhanced prospect of the 400 dwellings per annum figure being achieved.</p>

	Summary of recommendations: (a) Consider directing some additional housing towards the larger rural centres (b) Consider some additional allocations to the larger rural centres
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP870
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Aspire's main comment on this policy relates to criteria 4, which requires applicants bringing forward major development proposals to go through the Design Review process.</p> <p>Major development for residential development amounts to proposals of 10 dwellings or more. The design review process is considered by Aspire as an RP to be an onerous requirement for small and medium size developers and registered providers.</p> <p>Aspire are of the opinion that the Design Review process is of little value for smaller schemes, and in addition, adds considerable costs in terms of time and finance to go through this process. For significant proposals, the design review process is likely to be of more value, however for smaller proposals it is not considered to add significant value.</p> <p>As such, it is recommended that the design review process applies to larger schemes of 50 dwellings or more.</p> <p>Summary of recommendations: (a) Amend the wording of criteria 4 so that the design review panel process is only required for developments of 50 or more dwellings.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP874
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes



## Q6 Details

Please see supporting representation by Knights on behalf of Aspire. The Council's Housing and Economic Needs Assessment Update (2023) identifies an annual net need to deliver 278 affordable homes per annum over the plan period. At a recent public inquiry relating to application reference 21/01041/OUT4, affordable housing evidence was presented which made the following conclusions which were not contested by the Council:

- (a) The number of households on the Council's affordable housing waiting list amounted to 1550 households, which represents a substantial number of households in need of an affordable home now.
- (b) There has been no plan-led delivery of affordable housing through allocations in the Borough for at least 20 years, which needs to be urgently addressed through new local plan allocations and up to date policies.
- (c) Despite the delivery of 1081 new affordable homes since the adoption of the Core Spatial Strategy or 1347 new affordable homes since the time of the Council housing stock transfer, the affordable housing stock in the Borough has only grown by 22 affordable homes (net) over a period of 23 years.
- (d) More recent figures over a 5 year period show a net decline in affordable housing stock of 151 or 224 affordable homes per annum, depending upon which dataset is used.
- (e) The proportion of social housing stock as part of the overall housing stock in the Borough shrank from 18.7% in 2011 to 17.1% in 2021 (2011 and 2021 Census figures).
- (f) The number of new affordable housing units being delivered is insufficient to replace those being lost to Right to Buy sales meaning that the existing needs and future needs of households in need of affordable housing is not being met.
- (g) Figures provided by Aspire Housing demonstrated that over a 6-month period, on average, there are 37 bids per affordable home which becomes available for those households on the affordable housing waiting list.
- (h) The emerging supply of affordable housing from sites with planning permission is insufficient to meet the needs of those on the Council's affordable housing waiting list and the completion of those affordable housing units that form part of the council's 5 year housing land supply would still leave 1400 households on the council's affordable housing waiting list.
- (i) The delivery of student accommodation and any accommodation that may be released back onto the housing market as a result of the delivery of student housing will not address affordable housing needs.
- (j) The private rental sector is unsuitable and unaffordable for those in affordable housing need.
- (k) Lower quartile and median quartile house prices are significantly higher in the rural areas than in the urban areas with affordable housing tenures representing a smaller proportion of the overall number of homes in the rural area compared to the urban area and the Borough as a whole

2.3 With regard to paragraph 2.2(g) above, Aspire have provided an up to date table of shortlists let, number of bids, and the average number of bids per property, and this information is provided at Appendix 1. This shows that between October 2022 and September 2024, the average number of bids per affordable home that becomes available each month has been increasing, with the average number of bids per property increasing to in excess of 100.

**POLICY HOU 1: AFFORDABLE HOUSING**

Aspire Housing is the largest affordable housing provider in the Borough and have a number of comments to make on Policy HOU 1.

As a general point, Aspire welcome the proposed uplift of the affordable housing requirement on greenfield sites across the Borough to 30% from the current 25%.

Having estimated the likely affordable housing contributions from proposed allocations for 10 dwellings and above, there is potential to deliver 1365 affordable housing units from site allocations. This represents an uplift of around 182 affordable dwellings compared to what could be achieved through the current policy of 25%.

At Regulation 18 stage, Aspire made the point that it was not clear to Aspire the rationale for reducing the affordable housing requirement on previously developed sites in the low value zone and the amount of affordable housing that is likely to arise were this policy to be implemented in comparison to the current blanket 25% requirement.

Were there to be a blanket requirement for 30% affordable housing contributions on all sites, then it would be theoretically possible to deliver 1419 affordable homes, which would be an uplift of 237 affordable homes compared to what could be achieved with the current 25% policy. Were the threshold to be increased to a third (33%), then 1561 affordable homes could be achieved, which would be an uplift of 378 affordable homes.

Evidence should be provided to demonstrate how many previous applications on previously developed sites in these zones have been subject to viability assessments to justify a reduction in affordable housing contributions in order to provide further justification for this policy.

In any event, the analysis provided above suggests that the proposed policy could potentially deliver 1365 affordable housing units on proposed allocations. Over a 20 year period, this would amount to an average of 68 affordable homes per annum, which is substantially below the 278 affordable homes per annum that the Council's evidence base suggests is needed. Therefore, any potential to increase the amount of affordable housing delivered through allocations should be taken up.

Given the substantial need for affordable housing across the Borough, it is considered that this policy requirement requires greater justification.

With regard to affordable housing requirements on previously developed sites in the high value zone, the DLP proposes to maintain the current requirement for major developments of 25% affordable housing. However again, it is not clear how much affordable housing would actually be delivered on such sites, given that the high value zones primarily cover the rural parishes of Loggerheads, Maer and Whitmore and Keele. Existing CSS Policy ASP6 already places an emphasis on the development of previously developed sites within existing settlement boundaries in these locations, however the council's own housing land availability assessments demonstrate that there are very few previously developed sites in these locations. Further, there are already routes where affordable housing contributions can be reduced on previously developed sites, such as by making use of the vacant building credit if there are vacant structures present on such sites.

Further, the only previously developed site that has been identified as an allocation in the high value zone is LW87 in Loggerheads and the policy as it stands would not yield any additional affordable housing units.

Aspire would also like to point out that there are some areas of the Borough, that are generally seen as higher value areas, but they are shown as lower value areas as part of the current DLP consultation. It is considered that these areas should be identified as higher value areas in the next draft of the plan.

ONS data<sup>5</sup> is available that provides ward level lower quartile and median house price data for all homes, new build homes and median and lower quartile prices for different property types.

Extracts for the above data are provided as Appendix 1.

The Audley Ward is a more rural area of the Borough and that is identified as a low value zone. The lower quartile prices for this ward are comparable with the lower quartile prices identified for Madeley which is identified as a high value zone. Given that the Audley ward is a more rural zone where affordability and housing availability is likely to be an issue, it is considered that this zone be identified as a high value zone for the purposes of this policy.

Whilst it is acknowledged that the plan wide viability study is quite high level, it is considered that based on actual house prices that can be achieved in the wards identified that these wards should also be identified as higher value zones for affordable housing policy purposes should the Council continue with the current policy as drafted, rather than the policy suggested by Aspire of a blanket 30% affordable housing policy for all sites across the Borough, unless a site specific viability appraisal suggests otherwise. It is considered that the starting point for this policy should therefore be a blanket 30% affordable housing contribution from all sites, with an exception that this can only be reduced where viability evidence is provided in accordance with criteria 5. It is therefore proposed to amend the policy wording for criteria 1 as follows:

On major residential development sites, 30% of the total number of dwellings will be provided as affordable housing units, unless viability evidence demonstrates that the amount of affordable housing required to be provided would not be viable in accordance with criteria 5 of this policy.

Criteria 3 of Policy HOU 1 seeks to identify a percentage threshold for the affordable housing mix to be provided as part of housing development schemes by specifically requiring 25% of the affordable housing to be provided as First Homes.

Aspire Housing are concerned that there is a lack of emphasis on shared ownership products in this policy as this form of affordable housing has a clear place in the affordable housing market. The policy worded in its current form has the potential to heavily restrict the delivery of notable affordable housing products, including affordable rent and shared ownership.

Aspire Housing consider that the affordable housing mix should be determined on a case by case basis in recognition of the affordable housing funding model that Registered Providers operate under. For example, Aspire are able to deliver social rent on the former Knutton Community Centre site due to values, mix, build cost and grant rates, whilst on the Cross Street Phase 2 site, Aspire can only deliver based on affordable rent in that case, otherwise there would be no delivery. Therefore it is considered that a more discretionary approach should be permitted by the policy in order to ensure that policies allow adaptability to changing market conditions and funding constraints.

In addition to the above, on sites where relatively small numbers affordable housing comes forward as part of on site provision through a section 106 agreement (e.g. affordable housing provision of 10 dwellings or less, a requirement for First Homes provision in addition to other forms of affordable housing makes the delivery of a wider affordable housing tenure mix complex for both developers and housing providers. Aspire Housing currently have 489 shared ownership properties (153 in Newcastle under Lyme) and are due to take on a further 55 shared ownership properties, including 45 in Newcastle under Lyme. We currently have no unsold / unreserved shared ownership properties.

As demonstrated above, shared ownership homes have a strong role in the market. Insufficient earnings to access a mortgage is a major barrier to home ownership, alongside insufficient savings for a deposit. Shared ownership is a more accessible form of homeownership which can start with a 25% share and in most cases permits staircasing up to 100% of the property value. As such it is a flexible affordable home ownership product that allows households to enter home ownership with a small deposit and to staircase to full ownership over time. Under the current policy proposals, it is likely that the delivery of shared ownership affordable homes within the Borough would reduce under the proposed policy.

In light of the above considerations, it is proposed that criteria 2 of HOU 1 is amended to read as follows:

The size, type and tenure of affordable housing to be provided shall comprise a mix of homes available for social and affordable rent, as intermediate (such as Rent to Buy and shared-ownership) housing, First Homes or other forms of affordable housing in line with national policy. The mix of affordable housing that is provided should be informed by local housing needs, the needs of households on the Council's affordable housing waiting list (and in particular, those in priority need), and agreed with the Council's Housing Team at pre-application stage and prior to the determination of any planning application

The above wording would ensure that affordable housing mix delivered by new developments can be more responsive to the needs that persist at the time a development proposal is considered and would provide more flexibility to deal with changing circumstances, which a fixed policy may not be able to respond to. In addition, some forms of affordable housing may be more viable to deliver than others, and amending the wording on the affordable housing mix may assist with delivering a greater number of affordable homes than otherwise might be the case on sites where viability is marginal. Aspire is happy to discuss the above further with the Council and assist further with formulating emerging affordable housing policies and sharing best practice, and would welcome the opportunity to discuss this further with the Council.

Summary of recommendations;

- Amend criteria 1 so that the overall affordable housing requirement for all major housing sites is 30%.
- If criteria 1 is to be retained, re-designate the Audley Ward as a high value zone.
- Remove the requirement for 25% of the affordable housing tenure split to be First Homes from criteria 3.
- Amend criteria 3 to allow a flexible approach to the affordable tenure mix on a case by case basis.

#### Q7 Modification

Please see supporting representation by Knights on behalf of Aspire

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP878
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Policy HOU3 sets out policy on adaptable dwellings and space standards and standards for older persons housing. It is considered that this policy should be broken down into more distinct parts.</p> <p>With regard to criteria 1, it is considered that this should be split into two parts to separate NDSS from Part M4(2).</p> <p>With regard to Part M4(2), it states that all new homes should be built to accessible and adaptable dwellings standards, including conversions. With regard to this particular element, the requirement to build to M4(2) may not be practical to some conversions, particularly for older buildings and listed buildings. As such, the conversions element should be removed from the policy. In addition, Part M4(2) is not mandatory for conversions that could come forward under permitted development, so such fallback schemes could be used to negate this requirement where relevant and lead to protracted arguments/negotiations at application stage when applicants seek to remove such a requirement, which could negate much needed new housing which could come forward quickly. As such, the policy should reflect this by removing the requirement for conversions to meet Part M4(2).</p> <p>In addition to the above, mandatory M4(2) compliance should not apply to 100% affordable housing schemes in order to support the viability of affordable housing developments.</p> <p>With regard to Nationally Described Space Standards, this should be listed as a separate criteria in order to ensure that the policy is not conflated with the Part M4(2) requirement.</p> <p>In addition, it is considered that like in Cheshire East, some consideration be given to a transitional arrangement upon adoption of the plan. It is likely to be the case that a number of residential development proposals will already be subject to planning applications around the time that the plan is due to be adopted and that the adoption of a plan part way through the determination of an application could require schemes that are not wholly compliant with NDSS to need to be re-designed resulting in the delay to the delivery of such schemes if applications have to be amended or withdrawn. As such, it is suggested that NDSS is not a requirement of new development until 6 months from the date of the adoption of the Local Plan.</p> <p>With regard to NDSS and affordable housing in particular, the Homes England Capital Funding Guide 2021 – 2026 requires units to be sized to be at least 85% of NDSS as the benchmark for grant led affordable homes.</p> <p>The NDSS requirement can also affect the viability of bringing affordable housing forwards. Aspire have confirmed to us that if a property costs more than it is worth, which is often the case on design and build sites that are 100% affordable and in a low value areas, then it causes a financial impairment or a loss (if shared ownership). Therefore it's imperative to continue to provide good quality housing but at 85% NDSS rather than 100% due to build costs (which is the accepted position from Homes England as referred to above).</p> <p>If there is a risk of impairment as outlined above, then Aspire as an RP would be very unlikely to develop. Aspire have provided the figures below for one of their sites in Knutton to demonstrate that viability can become an issue when NDSS is enforced:</p> <p>Example: Knutton:</p> <p>85% NDSS</p> <p>Open Market Value per unit Average £210k</p> <p>Build Cost at 85% NDSS per unit plus acquisition and fees, less grant £196,503</p> <p>Headroom per unit of £13,497</p> <p>100% NDSS</p> <p>Open Market Value per unit average £210k</p> <p>Build Cost at 100% NDSS per unit plus acquisition and fees, less grant £213,352</p> <p>Therefore, headroom per unit of £3,352</p> <p>In light of this, it is suggested that some flexibility is included in the policy with regard to space standards for affordable housing that meet the benchmark for grant led affordable homes set out in the Homes England Capital Funding Guide (or its successor document).</p>

	<p>With regard to M4(3) provision, criteria 2 sets out policy for open market and affordable schemes. From an affordable housing perspective, there are some schemes which do not lend themselves to statutory provision of M3 units, or are financially unviable and the imposition of this requirement could affect the deliverability of a whole scheme while there are others that do. For example, Aspire are due to bring forward the former Zanzibar site on the edge of Newcastle-under-Lyme town centre, which is a key regeneration scheme with lots of abnormal costs. This will be a circa. 50 unit scheme across a number of floors while their Cross Street Phase 3 regeneration scheme in Knutton has bungalows which include M4(2) and M4(3) dwellings. Therefore an element of discretion / judgement is required. Likewise, the size threshold for the scheme should reflect the challenges faced by small and medium sized developers, such that the threshold for providing a percentage of M4(3) is increased above the current definition of major development of 10 dwellings to 50 dwellings</p> <p>As such, it is suggested that criteria 2 of the policy is broken down as follows for this element:</p> <p>(a) On major residential development sites of 50 dwellings or more, 10% of the open market dwellings proposed should be built to M4(3) wheelchair accessible standards</p> <p>(b) For developments of specialist housing for older people as defined by national policy, 10% dwellings proposed should be built to M4(3) wheelchair accessible standards</p> <p>(c) For developments of 100% affordable housing schemes the provision of M4(2) and M4(3) dwellings will be negotiated on a case by case basis.</p> <p>(d) For affordable housing coming forward as part of open market residential schemes, the provision of M4(3) dwellings coming forward as part of the affordable tenure mix will be negotiated on a case by case basis.</p> <p>In summary, it is recommended that the policy is re-worded as follows:</p> <p>Policy HOU3: Housing Standards:</p> <p>(a) All new dwellings (excluding conversions) will be provided to Part M4(2) (Accessible Adaptable Dwellings) set out in Building Regulations.</p> <p>(b) From 6 months following the date of the adoption of the Local Plan, all new open market dwellings will be provided to the Nationally Described Space Standard (NDSS) or the Building Control space standard relevant at the time of determining the application.</p> <p>(c) For affordable housing units, space standards should meet the minimum size thresholds that meet the benchmark for grant led affordable homes set out in the Homes England Capital Funding Guide (or its successor document).</p> <p>(d) On major residential development sites of 50 dwellings or more, 10% of the open market dwellings proposed should be built to M4(3) wheelchair accessible standards</p> <p>(e) For developments of specialist housing for older people as defined by national policy, 10% dwellings proposed should be built to M4(3) wheelchair accessible standards</p> <p>(f) For developments of 100% affordable housing schemes the provision of M4(3) dwellings will be negotiated on a case by case basis.</p> <p>(g) For affordable housing coming forward as part of open market residential schemes, the provision of M4(3) dwellings coming forward as part of the affordable tenure mix will be negotiated on a case by case basis.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP882
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Aspire Housing recognise the need to secure the funding of infrastructure that is directly related in scale and kind and which is necessary to make development acceptable in planning terms.</p> <p>However, policy IN 1 doesn't recognise the role that 100% affordable housing schemes make towards affordable housing provision. The DLP includes policies that allows developers of open market schemes to reduce affordable housing contributions if such contributions would render development proposals to</p>

	<p>be unviable under Policy HOU 1, however there appears to be no such scope to reduce the level of planning obligations for 100% affordable housing schemes under Policy IN 1 or Policy HOU 1.</p> <p>The Council clearly recognises that affordable housing schemes are subject to viability constraints as criteria 1h of Policy HOU 8 allows for the provision of an element of market housing on affordable housing schemes to assist with viability of such developments, however there needs to be greater policy direction to allow registered providers to reduce their planning obligations in order to guarantee the delivery of 100% affordable housing schemes and create certainty in order to deliver more affordable housing in an area where there is a significant need.</p> <p>It is quite often the case that those in affordable housing need are already resident in the Borough, and are either already living in existing affordable housing and need to relocate to alternative forms of affordable housing, are hidden households, are in temporary accommodation, or are households living in the private rental sector claiming housing related benefits to be able to subsidise their rental costs. As such, these households are unlikely to add further pressures or demands on existing facilities over and above what exists now.</p> <p>As such, a policy criteria should be included in Policy IN 1 (or Policy HOU 1, or a cross-referral between the two policies), which states that:</p> <p>For 100% affordable housing schemes, developer contributions towards off site infrastructure will not be sought.</p> <p>Further policy guidance on this matter could also be included within the Council's exception site policy.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP886
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire.</p> <p>Policy SE9 appears to contain a lot of duplicated policy to national policy, in particular criteria 2 and its sub-paragraphs relating to the assessment of harm to a designated heritage asset. It is considered that parts 2 and 3 of this policy can be re-worded to be more concise.</p> <p>20.2 With regard to non-designated heritage assets, Aspire consider that more clarity could be given in terms of archaeology.</p> <p>20.3 In a couple of cases, Aspire have been subject to incurring additional costs on sites where buildings have previously stood. One was a former farmhouse that had already been built over and the other was a site that contained old terraced homes that had also been subsequently built over, and Aspire were ask to conduct archaeological investigations prior to obtaining planning permission which resulted in additional cost and risk in terms of delivery timescales. In circumstances where a development site comprises a redevelopment site that has already been built on that is likely to have destroyed historical remains, then the policy should set out that in these circumstances, archaeological surveys and investigations should note be required</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP896
<b>Order</b>	182
<b>Title</b>	Policy KS11 Knutton Community Centre, High Street, Knutton



<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. KS11, KS17, KS18, KS19 – Knutton masterplan sites delivering a total of 73 affordable dwellings. Planning permission has recently been granted for KS11 and KS17 which would provide 75 affordable homes. Aspire does not control KS3, which is the other Knutton masterplan site, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP900
<b>Order</b>	202
<b>Title</b>	Policy SP2 Cheddar Drive, Silverdale
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. SP2 – Cheddar Drive / Bath Road Parade – This site comprises moribund accommodation which is now vacant. Aspire expect to complete the submission of planning for 14 affordable homes by November 2023.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP876
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	HOU2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Since the Regulation 18 consultation, the policy wording has been amended such that a fixed housing mix is not referred to in the policy, but rather reference is made to a range of sources which can be used to inform the overall housing mix.</p> <p>The above policy change with the current mix identified in the Housing Needs Assessment provided in the supporting text is welcome. The addition to the supporting text that the housing mix will also depend on location and site context / characteristics is also welcome.</p> <p>With regard to the affordable housing split listed in the supporting text, the current demand from those on Aspire's waiting list is as follows:</p> <p>Table 1 – Demand for affordable housing by house size from those on the waiting list held by Aspire (see attachment)</p> <p>The above therefore demonstrates that the broad mix identified in the Housing Need Assessment is slightly different to the demand that is identified by Aspire's actual waiting list which suggests that flexibility within the policy is justified.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reprs.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP880
<b>Order</b>	58
<b>Title</b>	Policy HOU8: Rural and First Homes Exception Sites
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU8
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Policy HOU8 sets out a proposed exception sites policy. Such a policy is welcome in principle, in particular, an attempt to define the size of site that would be acceptable in principle at criteria 1b.</p> <p>However, it is considered that the definition of an appropriately sized site could be improved and given more flexibility with thresholds provided for Rural Centres and thresholds for other settlements. The Rural Centres can clearly facilitate more development given the availability of services such as schools, a local shop, bus services, etc.</p> <p>However, it is considered that criteria 1a could be more appropriately worded in the case of some of the villages which are not identified as Rural Centres. If there is an acceptance of a need to provide affordable housing on rural exception sites, then the policy should recognise that there may be no large scale employment sites in reasonable proximity to the rural settlements and that some settlements may rely on services provided in another settlement nearby, as recognised in national policy. As such, the wording of criteria 1b may need to be amended to remove the words "and have reasonable access to existing employment, services and facilities including public transport" or add the words "where possible" at the end. There are instances where rural workers require housing in close proximity to rural employment and it is naturally more beneficial to provide this on the edge of existing settlement rather than as isolated dwellings.</p> <p>This may be better addressed through a refined definition of a small site at footnote 7 which will be set out below.</p> <p>With regard to the definition of an exception site in terms of size, it is suggested that a more detailed definition be provided to provide a more balanced approach between the larger and smaller rural settlements and that flexibility in approach is provided should there be a high level of affordable housing need. It is therefore suggested that the size threshold of an exceptions site is amended as follows:</p> <p>(a) For the Rural Centres, a small site is defined as a site which would not exceed whichever is the lesser of 5% of size of the settlement or 1 hectare, unless the local housing need assessment indicates a higher level of need than the lesser figure, in which case the higher may be used.</p>

	<p>(b) For other rural settlements, a small site is defined as a site which would not exceed whichever is the lesser of 10% of the number of dwellings within the main built up area of the village or 0.5 hectares, unless the local housing need assessment indicates a higher level of need than the lesser figure, in which case the higher may be used.</p> <p>The above is considered appropriate on the basis that for a smaller settlement that may have, for example, 50 dwellings within the settlement boundary, 5% would only yield 2.5 dwellings (or 3 rounded) in an area where the level of need may be greater. 10% would bring this up to 5 dwellings in such a scenario which would make a greater contribution to local needs which may arise and would still be proportionate to the size of the adjoining settlement. This re-wording of the policy would also provide a greater degree of flexibility to provide more rural affordable housing where it is needed and would provide further opportunities to address the very high levels of affordable housing need across the Borough. At present, Aspire are of the opinion that it is unclear as to how 278 affordable homes per annum will be achieved based on the percentages set out for large sites and allocations, and adopting a more flexible approach to rural affordable housing exception schemes would provide greater opportunities to addressing such needs. As set out earlier, an average of 68 affordable homes per annum could potentially be delivered on site allocations over the plan period, and the policy amendment as proposed above would provide a greater range of opportunities to increase the amount of affordable housing that is delivered if no further allocations are proposed over and above the current number of sites proposed for allocation in the DLP. With regard to criteria 1c, reference is made to taking into account the latest Housing Needs Assessment and other local data, such as a made Neighbourhood Plan. With regard to the latter, Aspire would urge that the council undertakes due caution with regard to using data from made Neighbourhood Plans, as the basic conditions test that Neighbourhood Plans need to pass to proceed to a referendum are very different to the tests of soundness that the Local Plan will need to pass at examination stage. If the Council wishes to have regard to data contained within Neighbourhood Plans, then a set of criteria should be put in place in the policy as to what sources of data within a Neighbourhood Plan can be relied upon and what methodology should underpin them.</p> <p>With regard to criteria 1h of Policy HOU 8, the ability to provide an element of market housing to support the viability of affordable housing exception sites is welcome. Given the high level of affordable housing need across the Borough, opportunities to facilitate as many exception sites as possible is to be welcomed, and provides an opportunity to unlock further sites than may otherwise be the case.</p> <p>With regard to criteria 1e, Aspire Housing have expressed concern relating to the requirement for housing to remain affordable in perpetuity. This because that such requirements secured through Section 106 agreements affects the ability of Registered Social Landlords to borrow other than at UEV for Social Housing which in turn affects providers financial capacity to invest in affordable homes. As such, the Council are encouraged to discuss this aspect of the policy further with registered providers and Aspire would welcome a further opportunity to discuss this with the Council in due course prior to the submission of the Plan to the Secretary of State</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP884
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. This policy sets out the Council's approach to Biodiversity Net Gain.</p> <p>Criteria 1 sets out that development should provide 10% BNG, however reference should be made to the exemptions set out in the Environment Act 2021, as some residential development proposals will be excluded from providing BNG.</p> <p>As such the wording of criteria 1 should be amended as follows:</p> <p>Development proposals (excluding exempt development as defined by the Environment Act 2021) will be permitted provided that they are designed to deliver at least a 10% measurable net gain of biodiversity habitat using the relevant statutory Biodiversity Net Gain (BNG) Metric. Provision of BNG should be secured and maintained for a period of 30 years.</p>

	<p>With regard to Criteria 3, this sets out the BNG hierarchy, and in cases where BNG is provided off site, suggests that such sites should be as close as possible to the development site.</p> <p>For off site BNG provision it is not a requirement of national policy and the Environment Act to require off site provision to be as close as possible to the development site.</p> <p>Planning Practice Guidance is clear that “Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarchy”.</p> <p>As such, this policy should be reviewed to ensure that there is no duplication or enhanced requirements when compared to national policy and legislation.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP864
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. The DLP includes a list of 12 strategic objectives. Strategic Objectives SO-3 (III), SO-5 (V), SO-6 (VI) are relevant to the delivery of open market and affordable housing and seek to deliver a higher mix of residential uses into existing town centres, provide a mix of housing types across the Borough, and to support the vitality of rural villages by improving affordability and to provide choice in housing types for local people.</p> <p>Aspire Housing support the above objectives, however it is considered that these objectives could be strengthened further to place greater emphasis on affordable housing delivery given the significant need for such housing identified in the Council's evidence base which identifies an annual net need to deliver 278 affordable homes per annum. In addition, there are substantial levels of existing unmet affordable housing needs that currently remain unaddressed. Whilst it is acknowledged that tackling affordable housing needs will take time, there should be more emphasis placed on this issue through planning policy and the Council's strategic objectives and this should be a golden thread of the council's housing policies. As such, a specific affordable housing objective should be included as follows:</p> <p>To deliver a significant uplift in the delivery of affordable housing across the Borough, in both the urban and rural areas to meet identified needs and to enable more households to access suitable and affordable housing, including the delivery of a broad range of affordable housing types, either as part of the overall housing mix on open market housing sites, or as 100% affordable housing schemes, including homes for affordable rent, shared ownership, first homes and other forms of affordable housing and routes to affordable home ownership.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP868
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott

<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. The main urban area of Newcastle-under-Lyme is currently tightly constrained by Green Belt, as are the larger rural settlements of Madeley and Audley. The proposal to remove suitable and deliverable sites from the Green Belt is supported given the existing tightly drawn Green Belt Boundary.</p> <p>The above is considered to be justified on the basis that there is a limited and finite supply of previously developed land both within existing settlement boundaries and elsewhere and the significant need for affordable housing (and other development needs, such as employment) across the Borough. The Council's position that exceptional circumstances exist to justify the release of Green Belt land to meet current and future housing and employment land needs and the evidence that underpins this position is fully endorsed by Aspire.</p> <p>Criteria 4 and 5 of this policy defers the decision maker to national policy in terms of assessing proposals for certain forms of appropriate development. Such exceptions set out in national policy redevelopment of previously developed sites, the re-use of buildings and limited affordable housing, including rural exceptions sites.</p> <p>Policy HOU 8 of the DLP provides a Rural Exception Site policy and representations on this proposed policy will be provided later in this representation.</p> <p>At Regulation 18 stage, the policy included a Criteria 7 which suggested that the Council would consider whether or not it is necessary to identify areas of safeguarded land to meet longer term needs beyond the Plan Period. This criteria is not included in the Regulation 19 DLP, and given the proposed changes to national policy, it is considered that the Council should explore the possibility of identifying safeguarded land to enable sites to be quickly identified and allocated when the new Local Plan is subject to review, or should additional land be required during the next plan period should delivery not come forward as quickly as envisaged</p> <p>Given the tightly constrained nature of the urban area, the limited availability of previously developed land within the urban area, and that a further Green Belt review may be required as part of any future Local Plan review, it is considered that it would be a sensible and sound approach to identify safeguarded land to meet future needs. This would also create long term certainty for the longer term delivery of housing (and other development needs) across the Borough. Aspire Housing would therefore support the identification of safeguarded land should the Council or the Inspector deem this to be necessary.</p> <p>Summary of recommendations:</p> <p>(a) Maintain all of the sites currently proposed for release from the Green Belt.</p> <p>(b) Consider identifying safeguarded land within the Local Plan in order to secure further development options beyond the plan period or land that can come forward in advance of any Local Plan review should delivery fall short of the housing requirement in order to deliver long term certainty.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP897
<b>Order</b>	184
<b>Title</b>	Policy KS17, Knutton Recreation Centre, Knutton Lane
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. KS11, KS17, KS18, KS19 – Knutton masterplan sites delivering a total of 73 affordable dwellings. Planning permission has recently been granted for KS11 and KS17 which would provide 75 affordable homes. Aspire does not control KS3,</p>



	which is the other Knutton masterplan site, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP901
<b>Order</b>	207
<b>Title</b>	Policy SP22 Former Playground off Ash Grove, Silverdale
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. SP22 - St Luke's Close, Silverdale - this site comprises vacant moribund accommodation with prior approval for its demolition obtained from the Council. Aspire are currently considering redevelopment options for the site, which may comprise a planning application for 41 affordable homes. It is anticipated that a planning application for this site would be submitted during the first quarter of 2024.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP889
<b>Order</b>	162
<b>Title</b>	Policy CH13 Castletown Grange, Douglas Road, Cross Heath
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CH13
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. Castletown Grange, Cross Heath – this site currently comprises moribund accommodation which is now vacant. Aspire have recently sold the site and the site is being refurbished for private tenants.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a>

	<a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP881
<b>Order</b>	81
<b>Title</b>	Policy RET4: Newcastle-under-Lyme Town Centre
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU8
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. Aspire has no objections to this policy per se, however the policy makes reference to Towns Deal funding. This includes locations such as Cross Street, which is not included in the wording of the policy and Aspire consider that this should be included alongside the reference to the Knutton Village Masterplan at criteria 1g.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP865
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. The Council's overall development strategy seeks to deliver a minimum of 8,000 dwellings over the plan period at 400 dwellings per annum. At Regulation 18 stage, the Council sought to deliver 7,160 dwellings over the plan period (358 dwellings per annum).</p> <p>At Regulation 18 stage, we argued on behalf of Aspire that the housing requirement should be higher on the basis that the affordable housing need identified at that time (278 affordable homes per annum) amounted to around 77% of the housing requirement.</p> <p>As such, the increase of the requirement to 400 dwellings per annum is welcome and is supported, however the annual affordable housing need still equates to around 69% of the annual housing requirement for Newcastle-under-Lyme.</p> <p>The expression of the housing requirement as a minimum starting point otherwise is welcome. Given the high level of affordable housing need, the fact that existing commitments will not reflect or address future needs, and the fact that not all housing sites will deliver affordable housing (for example, windfall sites of 10 dwellings or less, changes of use obtained under the General Permitted Development Order, infill development sites, or sites that can make use of the vacant building credit to offset some or all of their affordable housing contribution), it is questioned whether or not the annual housing requirement should be increased further, and in turn, whether or not some further housing sites should be allocated (or at least safeguarded) across the Borough in order to deliver the step-change in the delivery of affordable housing that is needed and to help to maintain a broader and more responsive supply of housing land to ensure that needs can continue to be addressed.</p>

	<p>The above approach is supported in the PPG which states that “The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.” (Emphasis added)</p> <p>(Paragraph 008 reference ID 67-008-20190722)</p> <p>On behalf of Aspire, Knights are mindful of the current consultation on the proposed changes to national policy through a revised NPPF and also the consultation on the outcome of the revised standard method which identifies a local housing need figure for the Borough of 593 dwellings per annum. Whilst the proposed transitional arrangements set out in the revised NPPF consultation mean that the Regulation 19 DLP can still progress to examination because the DLP housing requirement is not 200 dwellings or more below the standard method figure, it is suggested that the Council consider elevating the housing requirement figure above 400 dwellings per annum in order to plan for higher delivery rates to help meet current and future needs.</p> <p>Table 2 on page 14 of the Regulation 19 DLP under the supporting text to this policy provides details of the housing completions and commitments and refers to a housing trajectory at Appendix 6. It would be useful for a schedule of sites that underpins the figures at Table 2 to be included as an Appendix within the Local Plan so that the supply can be properly considered and assessed at the Examination.</p> <p>Summary of recommendations:</p> <p>(a) Consider whether or not the annual housing requirement should be increased further;</p> <p>(b) Consider the allocation of additional housing sites</p> <p>(c) Publish a schedule of sites that show completions and commitments that form part of the delivery trajectory as an appendix</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP869
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Criteria c of this policy requires a screening health impact assessment to be undertaken for major development schemes. Major development is currently defined as developments of 10 dwellings or more.</p> <p>This is considered to be an onerous requirement on small and medium sized developers and is likely to add further time and cost burdens on such developers.</p> <p>There is no evidence to suggest that building new housing results in unacceptable health impacts, and major developments are often subject to other requirements and assessments, such as providing travel plans to encourage the use of non-car modes of transport, design policies that promote walking and cycling, design policies that require the provision of greenspace and usable area of public open space, policies that require sites to be located in close proximity to services and facilities and other policies that promote active travel. These are all matters which are often covered within submitted transport assessments and design and access statements and are also issues considered at the design review stage.</p> <p>In addition, other validation requirements will also assess proposals with regard to air quality, noise and other environmental matters.</p> <p>New housing developments are unlikely to result in adverse impacts on health and wellbeing of themselves and it is considered that the need to provide a health impact assessment for residential development proposals is unnecessary. It is therefore proposed that this aspect of Policy PSD6 is removed as it would be an unnecessary duplication of process and other technical assessments that usually form part of a planning application submission.</p> <p>Summary of recommendations:</p> <p>(a) Remove criteria c of the policy which requires a health impact assessment. Such matters are adequately covered by other validation requirements and other policies</p>

<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP873
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Criteria 1 of this policy requires all major proposals to provide an energy statement which demonstrates the maximum feasible and viable use of onsite renewable energy generation.</p> <p>As per some of the responses above to over policies, major developments are for 10 dwellings or more, and again this would be an onerous requirement to place onto small and medium sized developers and registered providers bringing forward smaller schemes.</p> <p>In addition the above requirement is a duplication of Part L of the Building Regulations which requires Building Control to be notified that an analysis of high efficiency alternative systems has been undertaken and verified.</p> <p>Further to the above, it is unclear how local planning authorities are expected to undertake an analysis of renewable energy generation when they do not have the internal expertise available to enable a professional assessment of such schemes to be undertaken.</p> <p>Given that this requirement of the policy is a duplication of another regime, this aspect of the policy is considered to be unnecessary and it is requested that Criteria 1 is removed.</p> <p>Summary recommendations:</p> <p>(a) Remove criteria 1 of the policy</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP867
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes

<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. As is acknowledged elsewhere in this submission, there is a substantial need for a step-change in affordable housing delivery across the Borough, including in the rural areas.</p> <p>Criteria 3i of Policy PSD 4 is a welcome inclusion that allows proposals for rural and First Homes Exception sites in accordance with policies HOU8 and HOU9. Further comments relating to these policies are provided later on in this response.</p> <p>It is noted that the Local Plan includes a policies map that includes proposed settlement boundary lines. It is noted that to some settlements that there are some sites that are enclosed on three sides by a combination of proposed allocations and proposed settlement boundaries. In such scenarios, it is suggested that the settlement boundaries are re-drawn to include such enclosed sites within the settlement boundary as such sites are likely to meet the definition of "Grey Belt" set out in the proposed changes to national policy. This is considered to be a sensible way forward should an early review of the Local Plan be required to address changes to national policy. For example, there is land to the north of AB33 in Audley which would meet the definition of Grey Belt that is surrounded on three sides which could easily be included within the settlement boundary. In addition, the site edged green below (Cheviot Close, ST5, 6HU) is located adjacent to the settlement boundary and could be included within the defined settlement boundary as it comprises land that is previously developed.</p> <p>Land at Cheviot Drive – Grey Belt site that should be located within the settlement boundary</p> <p>In addition, it is noted that settlements within Audley Parish – Wood Lane, Miles Green and Halmer End – are proposed to be "inset" from the Green Belt, but the draft policies map suggests that these settlements will be identified within the inset boundaries as Open Countryside. It is considered that such settlements should be defined with a development boundary within which development would be acceptable in principle, rather than development within these settlements being restricted and judged against countryside policies. This would enable more infill development opportunities that are greater than 1 or 2 dwellings to be realised and this would also be consistent with the provision of a development boundary to settlements such as Madeley Heath.</p> <p>Criteria 3h is permissive of the infill of a small gap with one or two dwellings in an otherwise built-up frontage. It is considered that this aspect of the policy is too restrictive, as often there can be instances where small scale development can be delivered on gap sites that may be able to accommodate more than 2 dwellings but are less than 5 or 10 dwellings whilst reflecting the broad character of adjoining residential development. These small sites would provide greater scope for RPs to quickly deliver smaller sites without the need to undertake lengthy localised housing need surveys where the principle of development could otherwise be acceptable, and in addition would also support the SME sector more generally. It is therefore suggested that the reference to "one or two dwellings" is removed and the policy worded as follows: "the infill of a gap or the rounding off of a settlement with non-major housing development (up to ten dwellings) in an otherwise built-up frontage with development that is compatible with the character and appearance of adjoining residential development"</p> <p>Summary of recommendations:</p> <p>(a) Consider undertaking a further review of settlement boundaries to "round off" settlements and/or include sites within settlement boundaries that are currently identified as Green Belt or countryside that are already enclosed on three sides by development;</p> <p>(b) Provide a more flexible policy approach to infill development by broadening the definition of infill housing to allow up to ten dwellings in a built up frontage and also allow rounding off of settlements with housing development that is compatible with adjoining residential development.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP871
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes



<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Criteria 5 of this policy sets out that all developments are “encouraged” to complete a whole-life cycle carbon assessment in accordance with RICS guidance.</p> <p>It is not clear whether or not the above is mandatory or discretionary and in any event, this is a further requirement that could add onerous burdens on small and medium sized developers and registered providers. Given that this aspect of the policy does not appear to be mandatory and would otherwise be an onerous requirement on developers, it is considered that this criteria should be removed.</p> <p>Criteria 11 makes reference to taking account of the historic environment when implementing climate change measures. It is considered that this aspect of the policy should make reference to taking into account the Historic England Guidance published on 31 July 2024 and any successor publication.</p> <p>Summary of recommendations:</p> <p>(a) Remove criteria 5 from the policy.</p> <p>(b) Amend criteria 11 to refer to the Historic England Guidance published on 31 July 2024 or its successor publication.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP883
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Aspire. Policy SE 4, among other criteria, seeks financial contributions towards off site provision of sports and leisure. As per the response to Policy IN 1 above, off-site open space contributions can often be an issue for affordable housing viability on 100% affordable housing schemes, and as such, it is suggested that 100% affordable housing schemes are excluded from this requirement of Policy SE 4. 18.2 With regard to the on-site open space provision, criteria 3 sets out the types of open space that should be provided on site, and the amount of open space that should be provided. 18.3 This aspect of the policy should be re-worded to have a more flexible approach, as some of the types of open space that a development can provide on site may be affected by what needs to be delivered as part of any Biodiversity Net Gain requirement, which may require particular types of habitat, such as woodland or scrub/meadow to be provided over managed greenspace, such as amenity space or parks/gardens. As such, the wording of the policy should be provided as a more flexible approach, or the standards set out should be provided as supporting text to the policy as an indicative standard that can be deviated from should BNG requirements suggest that this may be required.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP887
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights

<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. TC22 – Former Zanzibar night club site - This site is currently at pre-application stage, and the site has already been cleared. Revised planning drawings are currently being prepared following receipt of SPCG comments. Aspire anticipate submitting a planning application during the third quarter of 2024.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP891
<b>Order</b>	236
<b>Title</b>	Policy TC7 Land bound by Ryecroft, Ryebank , Merrial Street, Corporation Street and Liverpool Road, Newcastle
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CH13
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. Castletown Grange, Cross Heath – this site currently comprises moribund accommodation which is now vacant. Aspire have recently sold the site and the site is being refurbished for private tenants.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP895
<b>Order</b>	236
<b>Title</b>	Policy TC7 Land bound by Ryecroft, Ryebank , Merrial Street, Corporation Street and Liverpool Road, Newcastle
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes

<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. TC7 – Ryecroft – a planning application is to be submitted in due course for around 45 dwellings.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>
<b>Comment ID</b>	NULLP899
<b>Order</b>	188
<b>Title</b>	Policy KS19 Land at Knutton Lane
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. KS11, KS17, KS18, KS19 – Knutton masterplan sites delivering a total of 73 affordable dwellings. Planning permission has recently been granted for KS11 and KS17 which would provide 75 affordable homes. Aspire does not control KS3, which is the other Knutton masterplan site, however Aspire would be interested in delivering this site as either the sole developer or as an affordable housing partner to a private developer
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire LP Reps.pdf</a> <a href="#">1343234 Aspire App 1.pdf</a>
<b>Comment ID</b>	NULLP903
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Aspire Housing
<b>Consultee Given Name</b>	Aspire Housing
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site allocations (omission)
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Aspire. Aspire Housing are committed to the delivery of the above sites and can confirm that they would be deliverable early in the plan period, and certainly within the first 5 years of the plan period. In addition to the above sites, Aspire control some other urban sites which are not identified within the DLP which can make a meaningful contribution to affordable housing supply in the Borough. Some of

	<p>these are regeneration opportunities in terms of replacing moribund accommodation with modern affordable homes that are fit for purpose and built to the latest standards:</p> <p>(a) Cross Street Phase 2 – this site has planning consent for 43 affordable homes and Aspire expect to start construction during October 2024.</p> <p>(b) Cross Street Phase 2 – a planning application for 71 supported living apartments under application reference 22/00653/FUL was withdrawn on 2 May 2023. Aspire recently gained planning permission for an alternative scheme of 39 affordable dwellings.</p> <p>(c) Gloucester Grange – this site comprises vacant moribund accommodation with prior approval for its demolition obtained from the Council. This site has recently been sold by Aspire and is currently being refurbished for private tenants.</p> <p>As demonstrated above, Aspire are committed to delivering their own affordable housing schemes in and around Newcastle-under-Lyme as well as being committed to taking on affordable housing delivered as part of open market schemes and are committed to assisting the Council deliver its minimum housing requirements as well as assisting with an uplift in the delivery of affordable housing across the Borough. Aspire are open to holding further discussions with the Council to facilitate the delivery of the Local Plan and refining the policies and allocations within it in order to deliver a robust and achievable plan</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Aspire
<b>Attachments</b>	<a href="#">1343234 Aspire App 1.pdf</a> <a href="#">1343234 Aspire LP Reps.pdf</a>

<b>Comment ID</b>	NULLP714
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Given Name</b>	Evolution 500
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Weatherley
<b>Agent Given Name</b>	Ben
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Evolution 500 Limited by Knights in response to the Newcastle-under-Lyme Borough Council Local Plan Regulation 19 consultation. Please also see attached representations.</p> <p>Our representations concern in particular the land to the west of Newcastle Road, Talke shown in the image at Figure 1 below ("the site", see attachment). We identify and promote this site as suitable for electric vehicle charging station, which could accommodate public electric vehicle charging facilities and associated development/uses for visiting members of the public.</p> <p>These representations follow a response to the previous Regulation 18 version of the Local Plan in August 2023, along with our Call for Sites submission at the same time, plus our subsequent (May 2024) provision of additional supporting material relating to the site's development potential for the uses mentioned at paragraph 1.3 above. A copy of the indicative site layout plan (see Appendix 1) and Transport Technical Note (Appendix 2) that accompanied our submissions in August 2023 and May 2024 are provided with this representation. The Transport Technical Note sets out the findings of SCP Transport's review of the highway and transport aspects of the proposed allocation of the land for an electric vehicle charging station.</p> <p>We have set out above need for a significant national expansion of public EV charging facilities and make reference to the government's electric vehicle infrastructure strategy<sup>11</sup>. A key part of the Government Strategy is that the transition to zero emissions transport is to be led by industry and consumers and that private investment is expected to drive the EV revolution. The planning system should therefore provide a framework that would support the development of EV charging infrastructure.</p> <p>Policy IN1: Infrastructure (bullet point 1) expresses broad support for "infrastructure related development". There is however no mention of EV infrastructure. We therefore request that policy IN1 be amended to provide explicit support delivery for such development. We suggest adding wording to state that schemes that deliver public EV charging infrastructure will be supported.</p> <p>We also note this policy approach would align with Strategic Objective IV including to "Reduce the Borough's carbon footprint and mitigate the impact of climate change in the Borough ensuring local policies promote sustainability. . ." and with Strategic Objective VII including to "Support active and sustainable travel".</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <p>a) Not "Positively prepared", as it fails to ensure the area's future infrastructure needs are fully met;</p> <p>b) Not "Effective", as it would not help ensure the infrastructure needed is delivered over the plan period.</p>
<b>Q7 Modification</b>	See attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the proposals for the development of the site.
<b>Attachments</b>	<a href="#">1345199- Evolution 500 Limited.pdf</a>
<b>Comment ID</b>	NULLP713
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Given Name</b>	Evolution 500
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Weatherley
<b>Agent Given Name</b>	Ben
<b>Q4 Part of document</b>	Policy



<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Evolution 500 Limited by Knights in response to the Newcastle-under-Lyme Borough Council Local Plan Regulation 19 consultation. Please also see attached representations.</p> <p>Our representations concern in particular the land to the west of Newcastle Road, Talke shown in the image at Figure 1 below ("the site", see attachment). We identify and promote this site as suitable for electric vehicle charging station, which could accommodate public electric vehicle charging facilities and associated development/uses for visiting members of the public.</p> <p>These representations follow a response to the previous Regulation 18 version of the Local Plan in August 2023, along with our Call for Sites submission at the same time, plus our subsequent (May 2024) provision of additional supporting material relating to the site's development potential for the uses mentioned at paragraph 1.3 above. A copy of the indicative site layout plan (see Appendix 1) and Transport Technical Note (Appendix 2) that accompanied our submissions in August 2023 and May 2024 are provided with this representation. The Transport Technical Note sets out the findings of SCP Transport's review of the highway and transport aspects of the proposed allocation of the land for an electric vehicle charging station.</p> <p>As detailed in the attached representations there is an urgent need for a significant expansion of public EV charging facilities and the Government's objective is that the UK should have one of the best EV infrastructure networks in the world. This requires a large increase in accessible charging points along the major road network. We consider this requirement amounts to the 'exceptional circumstances' case required by NPPF paragraph 145 to amend the Green Belt and remove to the Land west of Newcastle Road, Talke site. The location of the Land to the west of Newcastle Road, Talke site is shown relative to the A500/A34 junction on the image at Figure 2 below (see attachment):</p> <p>The A500/A34 junction to the north of Newcastle-under-Lyme is a nodal point on the strategic highway network. It sits around 5km east of the M6 at the northern margin of the North Staffordshire conurbation and forms a key gateway for journeys into and out of the Potteries area. The junction is 2.5km south of Kidsgrove, 2.75 km west of Tunstall and 6km north of Newcastle-under-Lyme, It also lies around 12km east of the significant employment hub of Crewe</p> <p>As a result of its strategic position adjoining the A500/A34 junction the Site is therefore close to various employment parks and housing areas and significant traffic passes the site. It would be well-located close to homes and places of work and an appropriate location for breaking journeys into or out of the Borough on the strategic road network. In that regard, a site adjacent to this junction is clearly a very suitable location for an EV charging station designed to meet a range of EV charging needs.</p> <p>Policy PSD5 refers to the Green Belt boundary as defined on the draft Policies Map. The land to the west of Newcastle Road, Talke site lies within the Green Belt. Given its suitability to support delivery of public EV charging infrastructure. We consider it should be removed from the Green Belt and allocated for such development. We therefore object to the Green Belt boundary as defined further to Policy PSD5. Whilst NPPF paragraph 146 sets out a requirement to demonstrate that all other reasonable options for meeting the identified need for development have been considered prior to release of Green belt sites, given the intersection of the A500 and A34 here, the proximity to the urban edge and the tightly drawn Green Belt encircling the urban area, we do not consider that there are alternative sites that provide a similarly suitable location for EV charging facilities.</p> <p>In the Council's Green Belt Assessment Part 1, the Site sits within Green Belt parcel number 34. This parcel comprises the area of land bound by Oak Tree Lane to the north, the A34 to the east, the A500 to the south and Talke Road to the west. Parcel 34 contains the Site itself, but also a Travelodge and a building housing a Subway/Greggs. There are also two dwellings off Talke Road to the south.</p> <p>The NPPF sets out the purposes of the Green Belt in the form of a list at paragraph 143. This text is reproduced below along with observations in respect of the contribution of The Site to these aims:</p> <p>'To check the unrestricted sprawl of large built-up areas' – The Council's Green Belt Assessment Part 1 considered that the Green Belt parcel makes 'no contribution' to this Green Belt purpose as it is not connected to the Newcastle-under-Lyme and Stoke-on-Trent urban areas. We agree with this conclusion in respect of The Site as it lies between the A500 and Talke and not at the boundary of the main urban area with the wider countryside.</p> <p>'To prevent neighbouring towns merging into one another' - The Council's Green Belt Assessment Part 1 considered the Green Belt parcel makes a 'weak contribution' to this Green Belt purpose, concluding that development would slightly reduce the actual gap between neighbouring towns but not the perceived gap. We would point to the roads that already encircle the land and separate it from the wider countryside and we consider that the site makes 'no contribution' of any meaningful form to the second purpose of the Green Belt.</p> <p>'To assist in safeguarding the countryside from encroachment' - The Council's Green Belt Assessment Part 1 considered the parcel would have a 'weak contribution' to this third Green Belt purpose. The assessment noted its boundaries all consist of roads, which are durable and would be able to prevent further encroachment if the parcel was developed and also noted there is development on part of the land. We agree, noting there is a Travelodge, Subway/Greggs building and two dwellings off Talke Road on the land. Given this development and that in particular, it is a very contained area of land with roads that fully encircle it and separate it from the wider countryside. We would go further and argue that the land makes the site makes 'no contribution' of any meaningful form to the third Green Belt purpose.</p> <p>'To preserve the setting and special character of historic towns' – The Council's Green Belt Assessment Part 1 considered the parcel as a whole would have 'no contribution'. We agree as there are no 'historic towns' in the vicinity that would be affected by development here and so the land makes 'no contribution' to the fourth purpose of the Green Belt.</p>

	<p>'And to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' - The Council's Green Belt Assessment Part 1 considered the parcel as a whole would make a 'moderate contribution'. This same conclusion was reached in respect of all Green Belt land that it can assist in urban regeneration, by encouraging the recycling of derelict and other urban land. We consider this argument to be flawed as where a site comes forward for development it would depend whether the uses proposed might alternatively have come forward on urban land within the North Staffordshire conurbation. In this case the land has a particular strategic location adjacent to the A500/A34 junction. The use being proposed in this representation is specifically related to the position of the land adjacent to this important junction. We consider that the release of the land in order that it be allocated to facilitate the development of specific roadside-type uses will not impact on whether derelict urban land is also brought forward elsewhere. It is therefore asserted that in the case of the land being brought forward for such proposals, there would be no impact on the final purpose of the Green Belt and the assessment should conclude 'no contribution' to this purpose.</p> <p>The Council's report provides an overall final assessment of the parcel as making a 'weak' overall contribution to the Green Belt. Given the points set out above we would argue that the Site makes 'no contribution' of any material nature to Green Belt purposes.</p> <p>Paragraph 143 of the NPPF states that when defining Green Belt boundaries local planning authorities should define boundaries "using physical features that are readily recognisable and likely to be permanent". We note that the Site, when considered with the Travelodge and Subway/Greggs building to the south, is self-contained within the landscape, it is surrounded by roads that would form clear and durable boundaries. These would provide the Green Belt with defensible boundaries over the plan period and beyond.</p> <p>We also note that the government announced planning reforms would be an important part of its plan for growth and has introduced a Planning and Infrastructure Bill that aims to "speed up and streamline the planning process". A revised NPPF is being consulted upon at the time of writing that includes a proposed new definition of "Grey Belt". It is proposed such land should be a focus when reviewing Green Belt boundaries and the consultation NPPF states "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations".</p> <p>For the purposes of plan-making and decision-making grey belt land is defined as land in the green belt that is previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (our emphasis).</p> <p>For the reasons set out above we submit that the west of Newcastle Road, Talke would fit this proposed definition as 'grey belt' and is a site that should be prioritized in any Green Belt review.</p> <p>A Written Ministerial Statement (WMS) by Angela Rayner, Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government on 30 July 2024 set out this proposed sequential approach. Indeed the WMS is a material planning consideration and makes clear the government's proposed approach going forward is to remove sites such as this "that are making a limited contribution to the Green Belt's purposes".</p> <p>With reference to policy PSD5 we therefore request the removal of the land from the Green Belt boundary as defined on the draft Policies Map.</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <p>a) Not "Positively prepared", as it fails to ensure the area's future infrastructure needs are fully met;</p> <p>b) Not "Effective", as it would not help ensure the infrastructure needed is delivered over the plan period.</p> <p>Further detail in respect of the case for the allocation of the site is set out below.</p>
<b>Q7 Modification</b>	See attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the proposals for the development of the site.
<b>Attachments</b>	<a href="#">1345199- Evolution 500 Limited.pdf</a>
<b>Comment ID</b>	NULLP712
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Given Name</b>	Evolution 500
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Weatherley
<b>Agent Given Name</b>	Ben
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes

**Q6 Details**

This representation is submitted on behalf of Evolution 500 Limited by Knights in response to the Newcastle-under-Lyme Borough Council Local Plan Regulation 19 consultation. Please also see attached representations.

Our representations concern in particular the land to the west of Newcastle Road, Talke shown in the image at Figure 1 below ("the site", see attachment). We identify and promote this site as suitable for electric vehicle charging station, which could accommodate public electric vehicle charging facilities and associated development/uses for visiting members of the public.

These representations follow a response to the previous Regulation 18 version of the Local Plan in August 2023, along with our Call for Sites submission at the same time, plus our subsequent (May 2024) provision of additional supporting material relating to the site's development potential for the uses mentioned at paragraph 1.3 above. A copy of the indicative site layout plan (see Appendix 1) and Transport Technical Note (Appendix 2) that accompanied our submissions in August 2023 and May 2024 are provided with this representation. The Transport Technical Note sets out the findings of SCP Transport's review of the highway and transport aspects of the proposed allocation of the land for an electric vehicle charging station.

The Government firmly expects that electric vehicles will be at the forefront of the UK's transition to zero emission transport over the next two decades. The government has therefore set a national deadline of 2030 for the end of sales of new petrol and diesel cars and vans in the UK. A 2035 deadline for the sale of hybrid electric / plug-in hybrid electric vehicles (PHEVs) has also been set<sup>1</sup> (where they are capable of covering a "significant distance" in zero-emission mode). After 2035, the only new cars and vans that can be sold will be purely electric vehicles (EVs). The timetable for the transition to EVs was originally set out in November 2020 by Boris Johnson as Prime Minister, with the subsequent prime minister (Rishi Sunak) also reaffirming his government's continuing commitment to this. This transition is already well underway, with buyers increasingly turning to alternatively fuelled vehicles. 17 per cent of new UK car registrations were battery only EVs in 2022, with an additional 1% being hybrids<sup>2</sup>. Whilst this take-up has accelerated rapidly in the last 2 – 3 years it still lags behind a number of other European countries<sup>3</sup>.

There will be wide-ranging implications of this transition to EVs. In particular, it requires a charging infrastructure network that is convenient, affordable, efficient and reliable. This includes an urgent need for a significant national expansion of public EV charging facilities. These provide for 'on route' charging and are therefore a critical part of the EV charging infrastructure that the nation will need. The Government's objective is that the UK should have "one of the best EV infrastructure networks in the world"<sup>4</sup>. Public charging facilities provide onroute charging and 90% of all current EV drivers rely on such facilities from time to time, especially when making longer journeys<sup>5</sup>. Public charging facilities also provide particular support for fleet drivers and van drivers who will more often need to utilise top-up charging during the day and also for those who do not have access to charging points at home or at work.

The Climate Change Committee commissioned research to assess future demand for Britain's electric vehicle public charging network. The report's key findings were that the number of rapid chargers located near the major roads network needs to expand from 460 in 2016 to 1,170 by 2030 and that the number of public chargers needed for 'top-up charging' needs to rise from 2,700 in 2016 to over 27,000 by 2030<sup>6</sup>. This issue is critical in order to address 'range anxiety' for drivers considering the purchase and use of an EV: "People making the switch to an EV must have the confidence that the public charging network they need is available"<sup>7</sup>. The Government's ambition is that the UK should have one of the best and most comprehensive EV charging networks in the world. Key performance indicators in the government's delivery plan<sup>8</sup> therefore include the total number of public chargepoints across the UK, and number of rapid chargepoints. The government's position is that "around 300,000 public chargepoints will be needed as a minimum to support our commitment to phase out sales of new diesel and petrol cars and vans by 2030"<sup>9</sup>.

With reference to the Government's electric vehicle infrastructure strategy<sup>10</sup>, there can be little doubt that looking forward there will be a significant need for public EV charging facilities in the plan area. In view of the Local Plan period to 2040, this is clearly a matter that the Local Plan should address. In particular, we would emphasise the national requirement for more accessible charging points along the major road network. Furthermore, at the local level Staffordshire County Council has recognised the need to deliver far more EV charging infrastructure in the county, plus taken steps to try to identify sites to deliver such additional infrastructure. For instance, in August 2024 the County Council undertook a survey that asked people for their views on EV charging infrastructure, with the feedback intended to be used to inform the placement of charging points across the county. Evolution 500 Limited responded to that survey to make the County Council aware of the availability and suitability of their land at Talke to deliver an EV charging station in close proximity to the local A-road network and M6 beyond (note that the locational suitability of the site for this proposed use and low provision of comparable facilities elsewhere in the local area is contained in SCP Transport's Technical Note at Appendix 2). We therefore request that policy CRE1 be amended to make explicit support delivery of public EV charging infrastructure. We note bullet point 10 of policy CRE1 reads "8. Schemes that help to deliver the Council's Carbon Capture Areas and Urban Tree Planting Strategy to facilitate carbon capture will be supported". We would suggest adding similar wording to state in addition that "schemes that deliver public EV charging infrastructure will be supported". We also note this policy approach would align with Strategic Objective IV including to "Reduce the Borough's carbon footprint and mitigate the impact of climate change in the Borough ensuring local policies promote sustainability. . ." and with Strategic Objective VII including to "Support active and sustainable travel" (paras 4.7 and 4.10). With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:

a) Not "Positively prepared", as it fails to ensure the area's future infrastructure needs are fully met;

b) Not "Effective", as it would not help ensure the infrastructure needed is delivered over the plan period.

<b>Q7 Modification</b>	See attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the proposals for the development of the site.
<b>Attachments</b>	<a href="#">1345199- Evolution 500 Limited.pdf</a>
<b>Comment ID</b>	NULLP716
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Given Name</b>	Evolution 500
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Weatherley
<b>Agent Given Name</b>	Ben
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Evolution 500 Limited by Knights in response to the Newcastle-under-Lyme Borough Council Local Plan Regulation 19 consultation. Please also see attached representations.</p> <p>Our representations concern in particular the land to the west of Newcastle Road, Talke shown in the image at Figure 1 below ("the site", see attachment). We identify and promote this site as suitable for electric vehicle charging station, which could accommodate public electric vehicle charging facilities and associated development/uses for visiting members of the public.</p> <p>These representations follow a response to the previous Regulation 18 version of the Local Plan in August 2023, along with our Call for Sites submission at the same time, plus our subsequent (May 2024) provision of additional supporting material relating to the site's development potential for the uses mentioned at paragraph 1.3 above. A copy of the indicative site layout plan (see Appendix 1) and Transport Technical Note (Appendix 2) that accompanied our submissions in August 2023 and May 2024 are provided with this representation. The Transport Technical Note sets out the findings of SCP Transport's review of the highway and transport aspects of the proposed allocation of the land for an electric vehicle charging station.</p> <p>As detailed above given the need for a significant expansion of public EV charging facilities and suitability of the land west of Newcastle Road, Talke for such infrastructure we consider the site should be removed from the Green Belt and allocated for such development in the Plan. As such we also request that the Policies Map be amended accordingly.</p> <p>We therefore conclude that the land in question can be released without harm to the wider Green Belt and its purposes. We therefore object to the non-inclusion of the land as a site to be removed from the Green Belt.</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <p>a) Not "Positively prepared", as it fails to ensure the area's future infrastructure needs are fully met;</p> <p>b) Not "Effective", as it would not help ensure the infrastructure needed is delivered over the plan period.</p>
<b>Q7 Modification</b>	See attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the proposals for the development of the site.
<b>Attachments</b>	<a href="#">1345199- Evolution 500 Limited.pdf</a>
<b>Comment ID</b>	NULLP715
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Given Name</b>	Evolution 500
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Weatherley
<b>Agent Given Name</b>	Ben
<b>Q4 Part of document</b>	Paragraph

<b>Q4 Paragraph number</b>	13.194 - 13.231
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Evolution 500 Limited by Knights in response to the Newcastle-under-Lyme Borough Council Local Plan Regulation 19 consultation. Please also see attached representations.</p> <p>Our representations concern in particular the land to the west of Newcastle Road, Talke shown in the image at Figure 1 below ("the site", see attachment). We identify and promote this site as suitable for electric vehicle charging station, which could accommodate public electric vehicle charging facilities and associated development/uses for visiting members of the public.</p> <p>These representations follow a response to the previous Regulation 18 version of the Local Plan in August 2023, along with our Call for Sites submission at the same time, plus our subsequent (May 2024) provision of additional supporting material relating to the site's development potential for the uses mentioned at paragraph 1.3 above. A copy of the indicative site layout plan (see Appendix 1) and Transport Technical Note (Appendix 2) that accompanied our submissions in August 2023 and May 2024 are provided with this representation. The Transport Technical Note sets out the findings of SCP Transport's review of the highway and transport aspects of the proposed allocation of the land for an electric vehicle charging station.</p> <p>Chapter 13 of the Draft Local Plan sets out proposed site allocations. Paragraphs 13.194 - 13.231 relate to Talke and Butt Lane ward. All of the sites identified are either housing site allocations or employment site allocations. As detailed above we consider that the Local Plan should contribute to meeting the urgent need for EV charging infrastructure and we consider that the Site should be allocated for an EV charging facility and related development. This reflects the findings of the Council's own Economic Needs Assessment which recognises the site's suitability for "employment or roadside uses".</p> <p>With regard to the specifics of the Site, the land is not in any beneficial use at present. The Environment Agency Flood Risk Map shows the site to be situated within Flood Zone 1. This is land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (&lt;0.1%), the lowest risk of flooding. No surface water flood risk is identified. Other than being included in the North Staffordshire Green Belt, the Site is not subject to any other statutory or non-statutory designations.</p> <p>The site is flat (and indeed it appears to have been levelled at some previous point) and it has a roundabout to the immediate north with an arm that leads to the edge of the land. Arranging a suitable highway connection is therefore likely to be relatively straightforward. A public right of way (PROW) runs to the south of the land (PROW Kidsgrove 205) but it sits beyond the Site's boundary and would be unaffected by the development, although it does provide a connection with the hotel and facilities to the south. The land is currently well-screened, but is nonetheless its character is very much set by the the relatively busy roads that form its northern and eastern boundaries. It also has the A500 200m to the south. The former road to the west is disused and no longer adopted highway.</p> <p>In respect of constraints the Council's SHELAA highlights that the site sits within a Coal Authority High Risk Area. This is however a constraint that affects many sites in the North Staffordshire area. It requires a Coal Mining Risk Assessment and Geo-environmental report ground to be prepared and submitted as part of a planning application. Remediation works and/or mitigation measures would then be required to be undertaken to the satisfaction of the contaminated land officer and Coal Authority. Any remedial measures requires would ensure that the site is made safe for development. Many sites across the conurbation are brought forward for development in this way and there is no reason to consider that any issues affecting the site cannot be overcome.</p> <p>The proposals of Evolution 500 Limited for the Site are currently being progressed and focus on a proposed EV charging facility on the land. This would provide an 'on route' charging facility. It is expected that a large proportion of the charging points would be rapid chargers (allowing a vehicle to charge up to most of its battery capacity within 30-45 minutes).</p> <p>Toilets and café restaurant facilities with broadband Wi-Fi are envisaged to be provided in service buildings for the use of customers whilst their car is charging. Vehicular access via the existing connection to the roundabout to the north is proposed and a circular traffic arrangement looping around the site is proposed.</p> <p>In addition to the electricity required for the charging points being sourced from the grid, solar panels would be mounted on the roof of the service buildings and potentially on canopies over the charging bays. Storage batteries are also proposed to balance out peak demand.</p> <p>An indicative site layout plan is provided at Appendix 1. Please note this is illustrative at this stage and subsequent liaison with the Council is proposed for which a further layout plan would be supplied.</p> <p>The technologies associated with EVs and their charging requirements are still emerging and rapidly evolving the development may need to come forward in phases to respond to changing demands and opportunities in respect of new EV charging infrastructure. Given this, and the need to ensure commercial viability for the developer, we would suggest the allocation of the land should not be prescriptive in respect of the proposed number of charge points or the ancillary facilities required.</p> <p>With reference to Chapter 15: Residential and employment allocations, we therefore request the land west of Newcastle Road, Talke be identified as a site allocation for EV charging and ancillary facilities.</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <ul style="list-style-type: none"> <li>a) Not "Positively prepared", as it fails to ensure the area's future infrastructure needs are fully met;</li> <li>b) Not "Effective", as it would not help ensure the infrastructure needed is delivered over the plan period.</li> </ul>
<b>Q7 Modification</b>	See attached representations



<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the proposals for the development of the site.
<b>Attachments</b>	<a href="#">1345199- Evolution 500 Limited.pdf</a>



<b>Comment ID</b>	NULLP906
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Gleeson Regeneration Limited
<b>Consultee Given Name</b>	Gleeson Regeneration Limited
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Wedderburn
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.157
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This report has been prepared on behalf of Gleeson Regeneration Limited by Knights, in respect of the Newcastle-under-Lyme Local Plan regulation 19 consultation.</p> <p>These representations respond to:</p> <ul style="list-style-type: none"> <li>• Chapter 13 - Site Allocations.</li> <li>• Policies map</li> </ul> <p>These representations refer in particular to land at Slacken Lane, Kidsgrove, shown on plan ref. UA22-005/P/SLP01-A at Appendix 1 ("The Site"). The land shown at Appendix 1 is subject to planning application ref 24/00089/FUL for housing development: application (170 dwellings, including 43 affordable homes) submitted in February 2024 and awaiting determination at the time of writing.</p> <p>This statement is accompanied by a Part A form and 2no. separate Part B response forms and responds to the draft plan as follows:</p> <ul style="list-style-type: none"> <li>• To object to the omission of land at Slacken Lane, Kidsgrove as a site allocation in Chapter 13, paragraphs 13.157 – 13.163.</li> <li>• To object to the omission on the Proposals Map of the land at Slacken Lane, Kidsgrove as a housing site allocation and to the shading of this land green as open space.</li> </ul> <p>Chapter 13, paragraphs 13.157 – 13.163 should be amended to include land at Slacken Lane, Kidsgrove as a site allocation</p> <p>Local Plan Chapter 13 sets out a series of land allocations to accommodate housing and employment requirements. We agree land should be allocated for development as part of the plan to provide a level of certainty over the Plan period in respect of the level and location of new development. We object however to the non-inclusion of the land at Slacken Lane, Kidsgrove and request that it be added to these sites at Chapter 13 of the draft plan. Paragraphs 13.99 – 13.105 cover the Kidsgrove and Ravenscliffe ward and we therefore object to these paragraphs for the reasons that are set out below.</p> <p>It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement, but also to provide a buffer over and above this requirement. Firstly, the NPPF is clear that plans should be positively prepared and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, and additional sites are required to enable the plan requirements to be met and indeed exceeded. NPPF paragraph 69 requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</p> <p>Not all sites considered deliverable will be realised during the plan period. It is considered that greater flexibility is required in the housing supply in order to reflect delayed sites and non-delivery and ensure sufficient flexibility over the plan period</p> <p>Additional specific deliverable sites are required in accordance with NPPF paragraph 69. Green Belt tightly surrounds the urban area with no provision for safeguarded land in the local plan between the urban area and the Green Belt. The supply of housing land however is limited to a 10% buffer. We would advocate a 20% buffer of sites be provided, to be available from the outset of the plan and that the sites comprising the buffer include land at Slacken Lane Kidsgrove.</p> <p>Kidsgrove is the main settlement in the north of the Borough. Under the Local Plan settlement hierarchy set out in policy PSD2 Kidsgrove forms the only tier 2 Urban Centre. The policy states "The centre performs a secondary, but complementary role to the Strategic Centre, providing a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. It is a key location for growth".</p> <p>The land at Slacken Lane site is 5.9 ha in extent of vacant land included in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) referenced as site 'BL4 - Land at Slacken Lane, Kidsgrove'. The site is accessed from Slacken Lane to the northwest. A public footpath extends east from Slacken Lane, along the southern edge of the site. The site is vacant with encroaching tree cover. It includes a significant proportion of made ground resulting from past tipping of former colliery spoil. The land rises to the centre of the site and drops to the southeast margin. The accompanying policies map shows that the land is not included in the Green Belt.</p> <p>The site is shown on the plan below: (see attachment)</p> <p>The site is located around 1km to the west of Kidsgrove Town Centre. It has housing to the south, east and west and the Stoke to Crewe railway line runs immediately to the north, with employment uses</p>

	<p>beyond. Slacken Lane connects from the northwest corner of the Site to Congleton Rd South (A34), 150m to the west of The Site.</p> <p>The locational sustainability of the site at Slacken Lane is clear when considering the proximity of services and facilities on the ground. These include a primary school at around 750m; a high school at around 700m; a Lidl store at around 500m and a Tesco supermarket at around 600m, along with multiple restaurants; public houses; churches and other facilities in the Kidsgrove area. Bus services are available from the stops on the A50 Liverpool Road to the north offering frequent services throughout the week to destinations including Alsager, Kidsgrove, Congleton and Crewe. Kidsgrove rail station is at around 800m with services to Manchester, Birmingham, Stoke and Crewe.</p> <p>In preparing a Local Plan, National Planning Policy Framework, paragraph 69 makes clear “Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. The site has been promoted previously for development via the Council’s Call for Sites process and accordingly the Site has been reviewed in the NuLBC Strategic Housing Land Availability Assessment November 2022 (SHELAA) referenced as BL4 – Land at Slacken Lane. The SHELAA assessment of the Site is that it is ‘achievable’ and ‘viable’, but also however that it is ‘unsuitable’ and ‘unavailable’. This is clearly incorrect however as the site sits within the urban area development boundary and we strongly consider should be considered ‘suitable’ and it is clearly ‘available’ given planning application ref 24/00089/FUL. We also note the significant technical work undertaken as part of the planning application that that clearly underlies its deliverability.</p> <p>Application ref 24/00089/FUL by Gleeson Development Limited is for 170 dwellings, including 43 affordable homes, with associated access and landscaping. This application was submitted in February 2024 and is awaiting determination at the time of writing. The site is to be brought forward by Gleeson Homes, a leading housebuilder, mainly focussed on building homes in the Midlands and North of England. Nearby Gleeson housing sites currently being brought forward are 330 homes (‘Watermills’) at Apedale Road, Chesterton ST5 6BH (5km south in Newcastle-under-Lyme District) and a 42 home development (‘The Hawthorns’) on former employment land at Anchor Road, Adderley Green, Stoke-on-Trent, ST3 5BL (around 13km to the south east)</p> <p>The proposed development would provide a policy compliant proportion of affordable housing, proving significant assistance to the Council in meeting the targets for affordable housing.</p> <p>Given that the site is controlled by a housebuilder, it is therefore considered that the site can begin to deliver housing within 18 months of planning consent being granted. Gleeson anticipate a first year build out rate of approximately 25 units, then around 40 in subsequent years.</p> <p>We therefore request the housing allocations included in the Local Plan of the Local Plan are amended and that the land Slacken Lane, Kidsgrove be allocated for housing development prior to submission for examination.</p> <p>We therefore object to the non-inclusion of the land to the south of High Street, Newchapel and as an allocated housing site at Chapter 13 of the draft plan. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <ul style="list-style-type: none"> <li>• Not “Positively prepared”, as it fails to ensure the area’s objectively assessed needs are fully met;</li> <li>• Not “Effective”, as it would not help ensure sufficient housing is delivered over the plan period,</li> <li>• Not “Consistent with national policy” as it fails to reflect the specific requirements of NPPF paragraph 69 that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</li> </ul>
<b>Q7 Modification</b>	Please see accompanying statement of representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see accompanying statement of representations
<b>Attachments</b>	<a href="#">1341046 Gleeson Regeneration Ltd - Supporting Statement 07 Oct 2024.pdf</a> <a href="#">1341046 Gleeson Regeneration Ltd - Appendix 1- Site Location Plan.pdf</a>
<b>Comment ID</b>	NULLP909
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Company / Organisation</b>	Gleeson Regeneration Limited
<b>Consultee Given Name</b>	Gleeson Regeneration Limited
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Wedderburn
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.157
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes

<p><b>Q6 Details</b></p>	<p>This report has been prepared on behalf of Gleeson Regeneration Limited by Knights, in respect of the Newcastle-under-Lyme Local Plan regulation 19 consultation.</p> <p>These representations respond to:</p> <ul style="list-style-type: none"> <li>• Chapter 13 - Site Allocations.</li> <li>• Policies map</li> </ul> <p>These representations refer in particular to land at Slacken Lane, Kidsgrove, shown on plan ref. UA22-005/P/SLP01-A at Appendix 1 ("The Site"). The land shown at Appendix 1 is subject to planning application ref 24/00089/FUL for housing development: application (170 dwellings, including 43 affordable homes) submitted in February 2024 and awaiting determination at the time of writing.</p> <p>The policies map should be amended to show the land at Slacken Lane, Kidsgrove as a housing site allocation, rather than shaded green</p> <p>The Local Plan consultations documents include a policies map in the form of a booklet containing various maps. Page 4 is entitled 'Urban Centre – Kidsgrove' and shows the land at Slacken Lane. The land is not shown as a housing site allocation and instead is shown shaded green</p> <p>We object to the omission on the Proposals Map of the land at Slacken Lane, Kidsgrove as a housing site allocation and to the shading of the land green as open space.</p> <p>As shown on the plan at Figure 1 above, the land is almost entirely surrounded by existing built development that is part of the urban area of Kidsgrove. The site comprises undeveloped land that is part of the urban area, rather than being part of the wider countryside.</p> <p>The site at Slacken Lane is primarily made ground created by past tipping of colliery waste. It is not public open space - it is private land. Whilst there are informal paths used by dog walkers and other local residents, rights of access are confined to the footpath along the southern edge. It is essentially a former waste site without any formal open space use and is simply vacant land awaiting remediation for development, as is commonly seen in urban areas where past industrial activity has taken place.</p> <p>We also query the need to identify additional supply of 'Natural and Semi-Natural Greenspace'. Paragraph 4.54 of the RSK Open Space and Green Infrastructure Strategy report (evidence base document ref. ED022) sets out that "Natural and semi-natural greenspace clearly provides the greatest total quantity of open space by typology" and "is well distributed within the Borough". In the report the Borough is divided into 3 sub areas and as paragraph 4.21 notes, "All three sub-areas have a high quantity of natural and semi-natural greenspace". The quantity standard proposed in Table 5.4 is 1.8 ha per 1000 population. The Urban North sub-area (where the Site is located) is identified at the plan base date as having 2.30 ha per 1000 population, therefore well in excess of the proposed standard.</p> <p>The Site is 5.9 ha in size. Table 4.2 in the RSK report identifies a total for natural and semi-natural greenspace (of all sizes) within NuLBC of 1886.67 hectares. The Site would therefore represent around 0.3% of this total (and around 2.5% of that available in the surrounding Urban North sub-area). As such we therefore strongly refute any suggestion that the site is required to meet the proposed open space standards.</p> <p>We also question the suitability of the site for safe open space use. Staffordshire Police have dealt with reports of anti-social behaviour on the land including motorbike use along both the public footpath and the informal paths, with risks of a collision between a bike and a person walking, particularly as many of the informal paths are narrow and have limited forward visibility due to vegetation. The area is also difficult to police as there are a number of points of access/egress and the vegetation cover prevents surveillance opportunities. There are also dilapidated buildings to the southeast, off Second Avenue which attract unauthorised activity and pose a potential fire hazard.</p> <p>It should also be emphasised that good quality public open space would be created as part of the development. These improvements could be secured by planning condition and a planning obligation could ensure their maintenance and retention where necessary.</p> <p>As set out above the site sits within the urban area development boundary so we strongly consider it to be 'suitable' and it is clearly 'available' given planning application ref 24/00089/FUL. We also note the significant technical work undertaken as part of the planning application that clearly underlies its deliverability.</p> <p>As noted above the site is to be brought forward by Gleeson Homes, a leading housebuilder and can begin to deliver housing within 18 months of planning consent being granted. The proposed development would provide a policy compliant proportion of affordable housing, proving significant assistance to the Council in meeting the targets for affordable housing. Given the company's profile and Gleeson's aspiration to bring forward the Slacken Lane land, this provides clear evidence that the site is viable for housing development and that it should be expected to be brought forward during the plan period. We therefore object to the non-inclusion of the land as a site to be removed from the Green Belt.</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <ol style="list-style-type: none"> <li>a) Not "Positively prepared", as it fails to ensure the area's objectively assessed needs are fully met;</li> <li>a) Not "Effective", as it would not help ensure sufficient housing is delivered over the plan period;</li> <li>b) Not "Consistent with national policy" as it fails to reflect the specific requirements of NPPF paragraph 69 that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</li> </ol> <p><b>CONCLUSION</b></p> <p>To assist in delivering local housing targets the Council should allocate the land at Slacken Lane as a residential development site. We therefore make representations in response to the following sections of the plan on behalf of Gleeson Regeneration Limited:</p> <ul style="list-style-type: none"> <li>• To object to the omission of land at Slacken Lane, Kidsgrove as a site allocation in Chapter 13, paragraphs 13.157 – 13.163.</li> <li>• To object to the omission on the Proposals Map of the land at Slacken Lane, Kidsgrove as a housing site allocation and to the shading of the land green as open space.</li> </ul> <p>The land at Slacken Lane is subject to a current planning application. It is available, suitable, and deliverable with a housebuilder in place and should be allocated for housing development in the Local Plan to assist in meeting the housing requirement.</p>
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<b>Q7 Modification</b>	Please see accompanying statement of representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see accompanying statement of representations
<b>Attachments</b>	<a href="#">1341046 Gleeson Regeneration Ltd - Appendix 1- Site Location Plan.pdf</a> <a href="#">1341046 Gleeson Regeneration Ltd - Supporting Statement 07 Oct 2024.pdf</a>

<b>Comment ID</b>	NULLP1003
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Given Name</b>	Graham Ward Family Trust
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p><b>Policy PSD2 – Settlement Hierarchy</b></p> <p>2.6. Lone Star do not have any particular comments on the overall strategy, apart from supporting the acknowledgement of the role of rural centres play in meeting the day to day needs of local residents and this will be supported by meeting some of the development needs of the Borough, commensurate to their role as villages.</p> <p>2.7. The evidence base for the settlement hierarchy, certainly the rural centres, is the Rural Topic Paper. Within this there is an assessment of the range of facilities, focusing on core facilities to assist in categorising rural settlement. In this regards Madeley performs well and scores green for all areas of the assessment. This shows it is therefore a sustainable rural settlement.</p> <p>2.8. Accordingly Lone Star fully support Madeley as a defined Rural Centre.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1007
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Given Name</b>	Graham Ward Family Trust
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p><b>Policy PSD4 – Development Boundaries and the Open Countryside</b></p> <p>2.14. Lone Star support the alterations to the settlement boundary of Madeley to accommodate the proposed site allocation MD29.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1005
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Given Name</b>	Graham Ward Family Trust
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3

<b>Q6 Details</b>	<p><b>Policy PSD3 – Distribution of Development</b></p> <p>2.9. The proposed distribution of development is noted within Policy PSD3. Lone Star would just question why Madeley and Madeley Heath, along with Betley and Wrinehill been considered together?</p> <p>2.10. Betley and Wrinehill are located to the north and are separated somewhat from Madeley. In addition, Betley and Wrinehill are also constrained by Green Belt.</p> <p>2.11. It is only the western edge of Madeley which is free from Green Belt constraints, and this is where the single allocation (which we address further below) is proposed for residential development to address the identified needs in this location.</p> <p>2.12. It is reasonable for Madeley and Madeley Heath to be considered together given the proximity of those settlements. As such, all development should be directed to Madeley and Madeley Heath. Accordingly, Lone Star would have no particular concerns with directing 250 dwellings across the plan period being directed to Madeley.</p> <p>2.13. In addition, and in order to be positively prepared and in accordance with Para 35 of the NPPF, all housing figures to be distributed to the various settlements should be presented as a minimum figure. In this respect, it is noted in Table 2 (pg 14) that the figures presented in the Plan are minimum housing requirements.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1009
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Given Name</b>	Graham Ward Family Trust
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29
<b>Q6 Details</b>	<p><b>Land North of Bar Hill, Madeley (Allocation MD29)</b></p> <p>2.15. Just to start with, Paragraph 13.141 and its title should be amended slightly to reference Madeley and Madeley Heath as the rural centre, not Madeley and Betley, as set out above.</p> <p>2.16. In relation to the wider settlement, Madeley was considered as part of the Rural Topic Paper which has informed the settlement hierarchy. Within this there is an assessment of the range of facilities, focusing on core facilities to assist in categorising rural settlement. In this regard, Madeley performs well and scores green for all areas of the assessment, which demonstrated that Madeley is a sustainable rural settlement capable of accommodating additional development.</p> <p>Response to Site Specific Requirements</p> <p>2.17. The site has been identified as a draft housing allocation in the Regulation 19 Local Plan under site MD29 which is clearly illustrated as a preferred location for residential development on the supporting Proposal Map. It would also be useful to make reference in the opening to this Policy to the outline planning application submitted at the site, as this is likely to be approved at the point of the adoption of the Plan.</p> <p>2.18. Lone Star would also comment on the site being identified for '150 dwellings. In order to comply with the outline application and for the plan to be positively prepared (in accordance with Paragraph 16 of the NPPF), and to make the optimum use of land (as required by various paragraphs in the NPPF including 8, 11, 119, 124 and 125), the quantum of development for this allocation should be changed to 'at least 155 dwellings'. This is also relevant for para 13.143, to ensure consistency.</p> <p>2.19. In relation to point 1 there is no need for a masterplan to be prepared in accordance with Policy SA1. A masterplan has been prepared and submitted in support of the planning application on the site (Appendix 2). This is the masterplan that should be referenced in this policy, given it has been subject to consultation with the Council and there are no consultee responses that cannot or have not been addressed.</p> <p>2.20. Active travel links are suggested in point 3, with an expectation of enhancements to the footbridge over the west coast mainline. It is recommended that the policy is specific and requires the footbridge to be improved in general accordance with the details agreed as part of the planning application, as shown on Plan Ref: SCP/210296/D10 (Appendix 3).</p> <p>2.21. Elements 4 (landscape led), 5 (long range views) and 11 (heritage) are also less relevant given the masterplan proposed at point 1. It should also be noted that the masterplan was subject to a Design Panel review before the application was submitted. This covered detailed elements which the masterplan should consider at the application stage, including reflecting local architectural styles and also reflecting topographical features such as landmarks and long views, which it has done.</p> <p>2.22. If there is a need for any direction on these specific elements, then reference could be made to the submitted DAS or the LVIA and the Heritage Assessment in the absence of a planning approval on the site at the point of the adoption of the Local Plan</p> <p>2.23. In relation to para 13.150, the element relating to the sequential approach to flood risk needs removing. As part of its allocation, the Council should have assessed flood risk on the site</p>



and determined it is sequentially preferable than other options in Madeley. When this site is allocated, it is not for a planning application to revisit this. Furthermore, the planning application is supported by a site-specific flood risk assessment, and we understand that shortly it will be confirmed by Network Rail and the LLFA that there are no flood risk issues in respect of this site.

2.24. The final point Lone Star would want to make is in respect of the Neighbourhood Plan. As drafted the Neighbourhood Plan would be in conformity with the strategic policies currently adopted Local Plan (NPPF footnote 16). It is not for this emerging Plan to be guided by existing Neighbourhood Plans and as set out in Para 30 of the NPPF, "Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently".

2.25. In order to assist the Council, we have suggested a track change version of the Policy MD29 below:

Land north of Bar Hill is allocated for residential development for 150 at least 155 dwellings. Development will be permitted to reflect outline planning application Ref: 23/00979/OUT and ~~will be permitted~~ subject to:

- 1. ~~Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements);~~ Be developed in broad compliance with the masterplan ref: 645868/Rev22D

2. Access to the development being taken via Bar Hill,

3. Improvements to active travel links, including enhancement to the ~~width and condition of~~ the existing footbridge over the rail line as set out in SCP Plan SCP/210296/D10,

4. The layout and development of the site will be in accordance with masterplan referenced at point 1 and the LVIA and DAS submitted in support of the application on the site ~~landscape led and buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area, including the area of open countryside on its western edge. Where possible existing hedgerows and trees should be retained on the site; particularly to the tree-lined driveway used to access the existing property at Moor Hall Farm;~~

~~5. Development within the site should preserve long range views to the west;~~

6. Any proposal should provide drainage details for surface water on the site,

7. Proximity of Bar Hill Wood Ancient Woodland in near proximity (500m) to the west of the site being recognised, & any impacts, mitigated,

8. Recognition of Tree Preservation Orders (TPO), including root networks,

9. ~~Submission of a noise assessment and~~ Reflect the mitigation strategy set out in the noise report prepared by InAcoustic (Ref:23-383) in relation to the impact of the A525 and West Coast Mainline railway line,

10. Preservation and enhancement of the existing Public Right of Way adjoining the site's western boundary,

11. ~~Submission of a Heritage Impact Assessment to~~ Demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council and the Heritage Assessment prepared in support of the application.

12. Financial contributions to improvements in the capacity of local schools and health facilities

2.26. Overall, Lone Star fully support the proposed allocation of site MD29, but there are slight alterations required, as set out above, to ensure that the allocation is positively prepared, to ensure it reflects the outline planning application on the site and is not subject to additional onerous requirements.

<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1000
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Given Name</b>	Graham Ward Family Trust
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1

<b>Q6 Details</b>	<p><b>Policy PSD1 – Overall Development Strategy</b></p> <p>2.2. This policy outlines that a minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 400 dwellings per annum.</p> <p>2.3. In terms of context for this figure, it is based on an employment growth forecast in the HEDNA Update 2024. It does not however reflect the existing SM figure of (330dpa).</p> <p>2.4. To support the Council in progressing with the Local Plan as drafted, Counsel has advised that the draft Plan falls squarely within exception 226(a) of the Draft NPPF and therefore the provisions provide imperative advice, namely that the Plan “will” be examined, in this case, under the provisions of the currently extant NPPF (Appendix 1)</p> <p>2.5. Accordingly Lone Star support the approach of Newcastle under Lyme in progressing a Plan to submission and examination in order to ensure that the Borough can have an up-to-date plan in place as soon as reasonably possible.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>

<b>Comment ID</b>	NULLP1030
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Harworth Group PLC
<b>Consultee Given Name</b>	Harworth Group
<b>Agent Company / Organisation</b>	WSP
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Stocks
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We consider that the Local Plan is not sound on the basis that it is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. The Local Plan as drafted fails to provide sufficient housing and employment land, and the proposed length of the Local Plan is not long enough in line with national policy requirements. Our rationale is set out in the supporting covering letter.</p> <p>This representation is submitted on behalf of Harworth Group PLC (herein “Harworth”) and Graham Ward Farms Limited to the Newcastle-under-Lyme Borough Council Final Draft Local Plan. This letter provides our comments as referenced in the completed Representation Form, in support of our response to questions 6 and 7 regarding the soundness of the Local Plan. Our comments go to the heart of the Local Plan and, whilst our Representation Form notes this relates to Policy PSD1: Overall Development Strategy, our amendments sought would require updates across the Local Plan document and Proposals Map.</p> <p>The specific matter which we dispute is the council's proposed approach to allocate two strategic employment sites (ref: AB2 - 'Land adjoining corner of A500 and M6 Southbound' and ref: KL15 - 'Land South of A525 between Keele University and Newcastle') and not 'Land off Talke Roundabout / A500', which was previously assessed in the Local Plan preparation under ref: TK30. We also consider the Local Plan does not cover a sufficient period of time. The Local Plan as drafted fails to provide sufficient housing and employment land. As such, we consider that the proposed approach to the Local Plan is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. We consider that the extension of the Local Plan duration to 2042 as a minimum or ideally 2045, and the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. We request that the council consider the contents of this letter and update the Local Plan prior to the submission for Examination. Otherwise, we would request that these comments are passed to the Planning Inspector(s).</p> <p>In addition to this letter and our completed representation form, this submission is supported by the following documentation:</p> <ul style="list-style-type: none"> <li>Updated Vision Document (October 2024);</li> <li>Updated Indicative Proposed Masterplan;</li> <li>Housing and Economic Growth Evidence (October 2024);</li> <li>Letter from Wendy Lancaster at Tyler Grange, with enclosed Accurate Visual Representations, dated 30th September 2024;</li> <li>Geo-environmental Desk Study (August 2023);</li> <li>Highways Access Appraisal (August 2023);</li> <li>Heritage Briefing Note (August 2023);</li> <li>Note on Socio-economic Benefits; and</li> <li>Ecology and Landscaping Combined Technical Note (August 2023).</li> </ul> <p>Appended to this letter is a plan of land to the north of Peacock Hay Road, which is also within Harworth's ownership, demonstrating that they have available land in the authority to compensate for the removal of this site from the Green Belt and contribute towards biodiversity net gain.</p> <p><b>HARWORTH GROUP PLC</b></p> <p>Harworth is one of the leading land and property regeneration companies in the UK, owning and managing c.16,000 acres on c.100 sites in the North of England and the Midlands. The company originated as the property division of UK Coal and is therefore an expert at dealing with complex sites with abnormal ground conditions and topography.</p> <p>Harworth is one of the key developers presently working in Newcastle under Lyme, currently delivering 'Chatterley Park' (previously referred to as 'Chatterley Valley' prior to the commencement of development), which is the authority's Regional Investment Site, and less than 1km from 'Talke Park'. Harworth fully acquired the land forming Chatterley Park in August 2017, and has subsequently secured planning permissions to allow earthworks to progress, with 1.2m sqft of industrial and logistics floorspace set to come forward, creating around 1,700 jobs.</p> <p>At Chatterley Park, Harworth has received significant interest from large national and international businesses attracted by the central location, access to the motorway network and ability to service major conurbations in all of the North West, East and West Midlands. There has been a range of occupiers with an interest for a variety of unit sizes. Harworth have also identified interest for “mid-box” (50,000 – 150,000 sqft) units and smaller units (20,000 – 50,000 sqft) and a pent-up demand for an underserved and important segment of the market.</p>

Whilst the larger and “mid box” units do attract distribution warehouses, there is range of occupiers with an interest in the range of unit sizes:  
 national/international logistics companies;  
 a pharmaceutical distributor;  
 manufacturing businesses;  
 a bespoke requirement for glass manufacturing;  
 a vehicle preparation centre for an automotive occupier; and  
 a local business in the medical field, looking to amalgamate operations across the North West centrally to the Stoke/Newcastle area.

The interest across all unit sizes includes occupiers looking to replace older premises, secure larger premises to align with growth of their business and/or amalgamate operations. This includes local businesses and national/ international businesses including one looking for a hub to service the north of England.

Talke Park is the logical extension/ next step to Chatterley Park in terms of its proximity to both that site and the strategic road network. The sites have a similar industrial history and topography, neither of which are deemed to be constraints by Harworth and Graham Ward Farms Limited to their proposed redevelopment of either site.

Harworth’s proven track record in the area and strong relationship with stakeholders (including the Councils and potential occupiers) demonstrates that, in partnership with Graham Ward Farms Limited, it can deliver Talke Park and its associated benefits within the plan period. Harworth has an extensive track record of delivering large-scale employment, residential and mixed-use developments. Further information is provided in the submitted Vision document.

#### TESTS OF SOUNDNESS

In order to be deemed sound, paragraph 35 of the NPPF (2023) states that a Local Plan must be:

- a) Positively prepared – this strategy must, as a minimum, meet the area’s objectively assessed needs. Paragraph 16 adds that a Local Plan should be “aspirational but deliverable”. The government has recently closed its consultation on updates to the NPPF. Whilst the transitional arrangements may mean that the Local Plan is examined under the currently adopted NPPF, the Government has made it clear through their consultation that “sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people”<sup>1</sup>.
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

#### SUMMARY ASSESSMENT AGAINST THE TESTS OF SOUNDNESS

We contest that the ‘Final Local Plan’ is:

- a) Not positively prepared – The allocation of two strategic sites is a low growth option and does not present an aspirational strategy. At a time when housing delivery is critical (evidenced by the government’s proposed reforms to the planning system to make the standard method for assessing housing needs mandatory) and economic growth is deemed essential to improving prosperity and living standards, the LPA should be pursuing an ambitious strategy. In order to be positively prepared and “aspirational”, the Council should target high growth scenarios, so far as any site allocations and policies are deliverable. The draft Local Plan fails to provide sufficient homes and does not plan for all types of employment growth. The Final Draft Local Plan proposes to allocate two strategic employment sites, which are aimed at different uses (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks

to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University). The overall delivery for industrial and logistics sites is therefore very low and limited. In terms of housing, the Local Plan should allocate additional sites to meet the housing need and this would also allow for delays to sites coming forward.

- b) Not justified – In the context of the above, we do not consider that the proposal represents an appropriate strategy, when a reasonable alternative would be to allocate ‘Talke Park’ (ref: TK30) as a strategic location, increasing housing numbers and employment land. The council’s evidence base is flawed, and the conclusions reached are incorrect in deeming that the allocation of the site in this plan would be premature. Indeed, the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that the perceived “considerable issues” associated with the site’s delivery (considered below) can be overcome, but that the lead-in time until development proceeds would not render the site suitable for allocation. This is not accurate, as outlined below. It is not justified to pursue low growth for housing and employment land.

- c) Not effective – The Local Plan will not deliver the housing need of the authority. As detailed in the Housing and Economic Growth Evidence and summarised below, the Council will fail to meet its five year housing land supply upon adoption of the Local Plan. With the requirement for Green Belt release established to even meet the low growth option, this suggests that it will not be possible to meet the shortage on windfall sites; as such, additional site/s need to be allocated; and

- d) Not consistent with national policy – The social objective of the NPPF concerns “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”. We consider that the Final Local Plan would not deliver a sufficient number of homes and therefore does not meet this fundamental requirement of sustainable development. The NPPF seeks for the planning system to help build a “strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure” (paragraph 8). The failure to allocate Talke Park represents a low growth scenario, which is not akin to a strong, responsive or competitive economy. Without this site, there would not be the right type of land in the right place to support businesses (considered below). The Council have acknowledged that Talke

Parke is in a sustainable location and it therefore follows to allocate further housing and employment land in this location. Furthermore, the proposed length of the Local Plan is not long enough in line with national policy requirements. The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15-year period from adoption. The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. We consider the Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. Further detail is set out below.

#### THE COUNCIL'S APPROACH TO TALKE PARK (REF: TK30)

The Land off Talke Roundabout / A500 (Talke Park) was identified as one of three potential strategic locations in the First Draft Local Plan (ref: TK30), potentially capable of delivering new homes and employment land. One of the evidence base documents supporting that consultation, the Strategic Employment Site Assessment Report (April 2023), which was prepared by Aspinall Verdi, concluded that there is a clear regional rationale for the allocation of at least two Strategic Sites in Newcastle-under-Lyme (paragraph 11.5).

The Final Draft Local Plan proposes two of the three sites are allocated. Talke Park is not proposed for allocation, and is proposed to remain in the Green Belt. The evidence base for the Final Draft Local Plan includes the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi. This provides their professional opinion that there is a need for two Strategic Sites in the new local plan, which should be AB2 ('Land at J16 of the M6') and KL15 ('Land at Barkers Wood, (Keele University) Keele'). We consider that some of the assumptions made in reaching this conclusion are incorrect, and subsequently the summary of our case is that:

1)

There is a need for three strategic sites in order to meet the housing and employment needs of the area; and

2)

Talke Park is a deliverable, sustainable site, and its allocation would represent growth aligning with the NPPF and aspirations of the government.

#### HOUSING AND EMPLOYMENT NEED ASSESSMENT

Harworth and Graham Ward Farms Limited have commissioned WSP to undertake a series of analyses into the housing and economic growth options for Newcastle under Lyme, and the approach taken to informing the Local Plan. The findings are presented in the Housing and Economic Growth Evidence which highlights Talke Park's role in generating local employment opportunities and providing housing for existing and new residents of Newcastle under Lyme.

The report identifies flaws in the Council's approach which relies upon an overly optimistic housing supply pipeline to meet long-term needs, which may lead to potential housing shortfall in the long-term. The government's consultation on changes to the NPPF includes a standard methodology to housing need. Whilst the transitional arrangements may mean that the Local Plan is not assessed against this higher housing target, this approach would need to be applied once the Local Plan has been adopted in order to assess their five-year housing land supply, and could therefore render policies out of date.

The report also highlights the Council's under-appreciation of emerging employment land needs, which may limit the Borough's growth potential. The strategic need and economic life of properties for warehousing and logistic sectors is overlooked, and the fast-growing and emerging sectors that are not captured by traditional UK SIC sectors are under-appreciated. Talke Park can provide a strategic employment site and a different offer to the proposed strategic sites AB2 and KL15 which can bring a variety of opportunities to existing and future employers in the area.

#### DELIVERABILITY OF TALKE PARK (REF: TK30)

The Strategic Employment Sites Assessment – 2024 Update (June 2024) (herein 'SESA 2024'), prepared by Aspinall Verdi, concludes that there are "considerable issues to overcome" associated with the delivery of Talke Park, and "there will be a long lead in period before any development takes place", suggesting this renders an allocation premature. We consider the perceived "issues" would not prevent development or cause a significant delay. Whilst the site is not an immediate short-term opportunity in the Local Plan, it can be delivered in the plan period. Our response to the comments made are set out in Table 1, which should be read alongside the Vision Document and the supporting technical reports (Geo-environmental Desk Study; Highways Access Appraisal; Heritage Briefing Note; Note on Socio-economic Benefits; and Ecology and Landscaping Combined Technical Note). These were prepared in support of the submission to the previous First Draft Local Plan consultation and, whilst some changes have been made to the Indicative Proposed Masterplan since that submission, the assessments are still applicable and accurate. Note that the masterplan has been underpinned by significant technical work such as an earthworks cut and fill model to demonstrate that the site is deliverable and this indicative layout could be achieved.

This establishes that the site can provide up to 390 new homes, and 95,500sqm (1m sqft) of employment floorspace (see attachment, table 1, Response to commentary in the Strategic Employment Sites Assessment – 2024 Update)

#### GREEN BELT

The main current constraint to the development of Talke Park is its location within the Green Belt. The preparation of a new Local Plan for Newcastle-under-Lyme presents an opportunity for this to be reviewed and the LPA has demonstrated exceptional circumstances to justify the release of land from the Green Belt in order to meet its development needs over the plan period.

Our previous representations submitted to the Draft Local Plan were supported by an Ecology and Landscaping Combined Technical Note, which set out the high-level baseline and opportunities and constraints to development within the Site.

The council has now published a Green Belt Assessment Part 4 (July 2024) which specifically assesses Talke Park (TK30), finding that it's development would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town. Whilst it finds that it would represent an incursion into undeveloped countryside, this would be the case for any greenfield site. The Assessment concludes that Talke Park (TK30) did not make a greater contribution to the purposes of the Green Belt than AB2 which is proposed for allocation; indeed TK30



is recommended to be taken forward for consideration, whilst AB2 is not. Its current Green Belt status cannot therefore be a reason for the non-allocation of Talke Park.

The letter from Tyler Grange dated 26 September 2024 provides a number of indicative visuals which demonstrate that development within the site will not obstruct views to and from the Wedgwood Monument, and that the Monument would continue to be seen as a distinct element on high ground separate from and raised above the development. The illustrative mitigation strategy in Appendix 1 demonstrates where opportunities existing to create visual and physical enclosure through the use of green infrastructure. This, together with careful use of cladding tones and designs will further reduce the visual impact of the proposed buildings in views to and from the monument.

In addition to the land at Chatterley Valley and Talke Park, Harworth is in control of additional land in the authority, namely land to the north of Peacock Hay Road (north of Chatterley Valley). A plan is provided at Appendix A (taken from a previous SHLAA assessment). This land, extending to 6.65ha and would be available to offer Biodiversity Offset and any Green Belt compensation land required in association with the allocation of land at Talke Park.

#### SITE DELIVERY TIMEFRAMES

The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi considers that Talke Park “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that if the potential issues associated with the site’s delivery can be overcome (as the above table demonstrates is the case), it is the lead-in time until development proceeds which would render the site unsuitable for allocation. However, Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer (as considered below). The anticipated programme for delivery and rationale is set out below:

The key constraint to the development of the site, at this time, is its Green Belt designation. An application would not be progressed until the site were to be released from the Green Belt. Should this be proposed prior to the submission of the Local Plan for Examination, the following timeframe may be brought forward as pre-application discussions and surveys could be progressed with greater comfort that the allocation is likely to be brought forward;

Whilst the Local Development Scheme targets the adoption of the Local Plan in 2025 Q5, we anticipate that a more realistic target would be 2026 Q4. If this is the case, then an application could be progressed with the necessary surveys/ assessments and consultation, to lead to the submission of an outline or hybrid planning application by the end of 2027. Note the hybrid application approach was taken at Chatterley Valley to ensure full planning permission was secured for the earthworks, allowing them to get underway sooner. The application could be determined in 2028 Q2/ Q3;

Earthworks could then proceed with the submission of reserved matters application/s for the first phase/s in 2028 Q3/4. The application could be determined in 2029 Q2/ Q3;

The first units could then be constructed and available before the end of 2029. We would expect this to include the first homes;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 5-6 years for the employment units, which may run from 2029 to 2035. This would form a logical continuation of the anticipated construction and occupation programme at Chatterley Park, whereby it is envisaged this will be constructed and fully occupied by 2030;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 8 years for the homes, on the basis of 50 being delivered per year, which may run from 2029 to 2037;

Harworth and Graham Ward Farms Limited are confident that the site can be delivered within the Local Plan period, whether this be up to 2040, or indeed longer (as considered below).

In summary, Harworth and Graham Ward Farms Limited do not consider that the design, planning, earthworks and construction programme for the site will not prevent it from being delivered in the Local Plan period. Indeed, we do not anticipate that this would be significantly different to the delivery of proposed strategic site AB2 given its location, so the availability of employment space will be limited, warranting the allocation of Talke Park.

#### BENEFITS

The allocation of Talke Park would:

Provide up to 390 new homes, housing needs/ growth;

Provide 95,500sqm (1m sqft)/ circa 21ha of employment floorspace, emp needs/ growth, providing up to 1,000 jobs in the construction phase and circa 3,600 permanent jobs once operational, of which around 1,000 would be taken by residents of Newcastle-Under-Lyme;

Meet local need for school places;

The Gross Value Added to the economy is estimated to be circa £15.3 million per year during the construction phase and £140 million per year during operation. It is also anticipated around £1.9 million per year in revenue would be generated through Council Tax and Business Rates receipts;

The location of Talke Park directly adjacent to the existing settlement limits offers clear benefits in terms of easy access to jobs, new homes, sustainable travel and green spaces. This local area would directly benefit from local expenditure of around £85,000 per year from the construction workforce over the construction phase, and around £5.3 million per year from the new residents;

Talke Park will promote sustainable communities, supporting improvements, connections and relationship with the wider area such as Wedgwood Monument;

Harworth and Graham Ward Farms Limited envisage the development to of high quality design and sustainability standards providing market leading approaches to ESG and Carbon Reduction, incorporating Net Zero design criteria and contributing to the delivery of Harworth’s Net Zero Carbon Pathway2. This means that all commercial buildings Talke Park will be:

—Net Zero Carbon in operation (subject to occupier process requirements);

—Net Zero Carbon in construction and operation for any units build after 2030; and

—BREEAM Excellent.

#### DURATION OF THE LOCAL PLAN PERIOD

The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15 year period from adoption, in order to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. It adds that, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part



of the strategy for the area (as is the case here where two strategic sites are currently proposed for allocation), policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. The Local Plan is therefore at significant risk of not being consistent with national policy.

The Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

#### CHANGES SOUGHT TO THE LOCAL PLAN

Harworth and Graham Ward Farms Limited seeks the allocation of TK30 as a Strategic Site, including the following:

Policy PSD1 – the inclusion of the site under point 3 as a strategic site “Land off Talke Roundabout / A500 to offer a sustainable urban extension providing a strategic employment location, new homes, and public space”.

Policy PSD5 – the site should be listed for removal from the Green Belt.

Update to Policy PSD3 – the figures in terms of housing and employment provision should be updated to account for the allocation of TK30.

Addition of a new Policy TK30 relating to the site's development. A suggested policy is provided below, which we would be happy to discuss further.

#### Policy TK30 ‘Land off Talke Roundabout / A500’

Land off Talke Roundabout / A500 is allocated as a sustainable urban extension providing employment land, new homes and public space. The site extends to circa 66 hectares and is allocated for uses including circa 390 new homes and 21 hectares (circa 95,500 sqm of floorspace) of employment land. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses and industrial processes. Development will be permitted subject to:

- 1.Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2.Safe and convenient access into the development via a new access on Talke Road for the employment development and provision of two access points on Deans Lane for the residential development,
- 3.In line with Policy SA1 (General Requirements), a masterplan and design code should be prepared and agreed for the site which will:

a.Consider sustainable travel links including cycle and pedestrian connectivity including to public transport links. Development should also consider walking and active travel for health and wellbeing purposes within the site,

b.provide for appropriate boundary treatments to the existing Green Belt,

c.Facilitate improvements to local footpaths and linkages to Wedgwood Monument

d.Achieve high quality design reflecting the landscape location of the site and creating a vibrant destination and attractive public realm. This should recognise the transitional location between the higher density urban and rural area,

e.Ensure the layout and development of the site is landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area including the Wedgwood Monument.

- 4.Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy,
- 5.Submission of a drainage strategy,

6.Appropriate measures to control impact of increased traffic movement or uses within the site on local amenity including noise and air quality on the surrounding area. This should include submission of a noise and air quality assessment and mitigation strategy,

7.Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Wedgwood Monument,

8.Financial contributions to improvements in the capacity of local schools and health facilities.

9.Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site.

10.Employment units to achieve at least BREEAM excellent standard with an aim for the most recent BREEAM outstanding standard,

11.Retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. Strengthened boundaries to the site, comprising landscape buffers, and the creation of new strong, defensible boundaries to the Green Belt,

12.The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement.

We also consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

#### CONCLUSION

We consider that, in its current form, the Final Draft Local Plan is not sound, on the basis that it is (1) not positively prepared, (2) not justified, and (3) not consistent with national policy. We consider that the allocation of ‘Land off Talke Roundabout / A500’ (herein ‘Talke Park’) would resolve this soundness matter. Harworth and Graham Ward Farms Limited are in control of the site and would therefore lead its design and delivery, as per Chatterley Park. Exceptional circumstances have been demonstrated to justify the release of land from the Green Belt. Allocating Talke Park would meet the Council's growth aspirations in terms of delivering sustainable new homes and jobs, meeting local needs and providing more economic opportunities for residents of Newcastle-under-Lyme. Harworth is an experienced land and property regeneration company which is currently investing in Newcastle under Lyme at the nearby Chatterley Valley site. The above commentary demonstrates why the site is suitable and available for allocation, notably:

	<p>The Council's own evidence base supports the allocation of the site. The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it “has the potential be a high-quality site for local employment [albeit] in a future local plan”. There is therefore recognition that the perceived issues associated with the site's delivery can be overcome, but the Council are uncertain on programme.</p> <p>The SWECO report which forms part of the evidence base notes that the Talke Site has the best walking accessibility score of the three potential strategic sites. That SWECO report, and Mosodi's independent assessment of the site, confirm that there are no highways or accessibility constraints to prevent the site being allocated.</p> <p>The council's Green Belt Assessment Part 4 (July 2024) concludes that the development of Talke Park would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town.</p> <p>Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer.</p>
<b>Q7 Modification</b>	We consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. We consider that the allocation of site ref: TK30 (the Land off Talke Roundabout / A500), as a strategic location, for housing and employment would resolve the soundness matters outlined at 6 above. Further detail is provided in the supporting covering letter.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In order to accurately outline our client's position and aid the Inspector in providing any further information relating to site TK30, on the basis we consider the allocation of the site would resolve our concerns about the Local Plan being unsound.
<b>Attachments</b>	<a href="#">1300486 Harworth Talke Cover Letter.pdf</a> <a href="#">1300486 Harworth APP2 Technical documents.pdf</a> <a href="#">1300486 Harworth APP 1 Vision Docs.pdf</a>
<b>Comment ID</b>	NULLP1031
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Harworth Group PLC
<b>Consultee Given Name</b>	Harworth Group
<b>Agent Company / Organisation</b>	WSP
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Stocks
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We consider that the Local Plan is not sound on the basis that it is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. The Local Plan as drafted fails to provide sufficient housing and employment land, and the proposed length of the Local Plan is not long enough in line with national policy requirements. Our rationale is set out in the supporting covering letter.</p> <p>This representation is submitted on behalf of Harworth Group PLC (herein “Harworth”) and Graham Ward Farms Limited to the Newcastle-under-Lyme Borough Council Final Draft Local Plan. This letter provides our comments as referenced in the completed Representation Form, in support of our response to questions 6 and 7 regarding the soundness of the Local Plan. Our comments go to the heart of the Local Plan and, whilst our Representation Form notes this relates to Policy PSD1: Overall Development Strategy, our amendments sought would require updates across the Local Plan document and Proposals Map.</p> <p>The specific matter which we dispute is the council's proposed approach to allocate two strategic employment sites (ref: AB2 - 'Land adjoining corner of A500 and M6 Southbound' and ref: KL15 - 'Land South of A525 between Keele University and Newcastle') and not 'Land off Talke Roundabout / A500', which was previously assessed in the Local Plan preparation under ref: TK30. We also consider the Local Plan does not cover a sufficient period of time. The Local Plan as drafted fails to provide sufficient housing and employment land. As such, we consider that the proposed approach to the Local Plan is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. We consider that the extension of the Local Plan duration to 2042 as a minimum or ideally 2045, and the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. We request that the council consider the contents of this letter and update the Local Plan prior to the submission for Examination. Otherwise, we would request that these comments are passed to the Planning Inspector(s).</p> <p>In addition to this letter and our completed representation form, this submission is supported by the following documentation:</p> <p>Updated Vision Document (October 2024);  Updated Indicative Proposed Masterplan;</p>

Housing and Economic Growth Evidence (October 2024);  
Letter from Wendy Lancaster at Tyler Grange, with enclosed Accurate Visual Representations, dated 30th September 2024;  
Geo-environmental Desk Study (August 2023);  
Highways Access Appraisal (August 2023);  
Heritage Briefing Note (August 2023);  
Note on Socio-economic Benefits; and  
Ecology and Landscaping Combined Technical Note (August 2023).

Appended to this letter is a plan of land to the north of Peacock Hay Road, which is also within Harworth's ownership, demonstrating that they have available land in the authority to compensate for the removal of this site from the Green Belt and contribute towards biodiversity net gain.

**HARWORTH GROUP PLC**

Harworth is one of the leading land and property regeneration companies in the UK, owning and managing c.16,000 acres on c.100 sites in the North of England and the Midlands. The company originated as the property division of UK Coal and is therefore an expert at dealing with complex sites with abnormal ground conditions and topography.

Harworth is one of the key developers presently working in Newcastle under Lyme, currently delivering 'Chatterley Park' (previously referred to as 'Chatterley Valley' prior to the commencement of development), which is the authority's Regional Investment Site, and less than 1km from 'Talke Park'. Harworth fully acquired the land forming Chatterley Park in August 2017, and has subsequently secured planning permissions to allow earthworks to progress, with 1.2m sqft of industrial and logistics floorspace set to come forward, creating around 1,700 jobs.

At Chatterley Park, Harworth has received significant interest from large national and international businesses attracted by the central location, access to the motorway network and ability to service major conurbations in all of the North West, East and West Midlands. There has been a range of occupiers with an interest for a variety of unit sizes. Harworth have also identified interest for "mid-box" (50,000 – 150,000 sqft) units and smaller units (20,000 – 50,000 sqft) and a pent-up demand for an underserved and important segment of the market.

Whilst the larger and "mid box" units do attract distribution warehouses, there is range of occupiers with an interest in the range of unit sizes:

- national/international logistics companies;
- a pharmaceutical distributor;
- manufacturing businesses;
- a bespoke requirement for glass manufacturing;
- a vehicle preparation centre for an automotive occupier; and
- a local business in the medical field, looking to amalgamate operations across the North West centrally to the Stoke/Newcastle area.

The interest across all unit sizes includes occupiers looking to replace older premises, secure larger premises to align with growth of their business and/or amalgamate operations. This includes local businesses and national/ international businesses including one looking for a hub to service the north of England.

Talke Park is the logical extension/ next step to Chatterley Park in terms of its proximity to both that site and the strategic road network. The sites have a similar industrial history and topography, neither of which are deemed to be constraints by Harworth and Graham Ward Farms Limited to their proposed redevelopment of either site.

Harworth's proven track record in the area and strong relationship with stakeholders (including the Councils and potential occupiers) demonstrates that, in partnership with Graham Ward Farms Limited, it can deliver Talke Park and its associated benefits within the plan period. Harworth has an extensive track record of delivering large-scale employment, residential and mixed-use developments. Further information is provided in the submitted Vision document.

**TESTS OF SOUNDNESS**

In order to be deemed sound, paragraph 35 of the NPPF (2023) states that a Local Plan must be:

- a) Positively prepared – this strategy must, as a minimum, meet the area's objectively assessed needs. Paragraph 16 adds that a Local Plan should be "aspirational but deliverable". The government has recently closed its consultation on updates to the NPPF. Whilst the transitional arrangements may mean that the Local Plan is examined under the currently adopted NPPF, the Government has made it clear through their consultation that "sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people"<sup>1</sup>.
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

**SUMMARY ASSESSMENT AGAINST THE TESTS OF SOUNDNESS**

We contest that the 'Final Local Plan' is:

- a) Not positively prepared – The allocation of two strategic sites is a low growth option and does not present an aspirational strategy. At a time when housing delivery is critical (evidenced by the government's proposed reforms to the planning system to make the standard method for assessing housing needs mandatory) and economic growth is deemed essential to improving prosperity and living standards, the LPA should be pursuing an ambitious strategy. In order to be positively prepared and "aspirational", the Council should target high growth scenarios, so far as any site allocations and policies are deliverable. The draft Local Plan fails to provide sufficient homes and does not plan for all types of employment growth. The Final Draft Local Plan proposes to allocate two strategic employment sites, which are aimed at different uses (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks

to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University). The overall delivery for industrial and logistics sites is therefore very low and limited. In terms of housing, the Local Plan should allocate additional sites to meet the housing need and this would also allow for delays to sites coming forward.

b)Not justified – In the context of the above, we do not consider that the proposal represents an appropriate strategy, when a reasonable alternative would be to allocate 'Talke Park' (ref: TK30) as a strategic location, increasing housing numbers and employment land. The council's evidence base is flawed, and the conclusions reached are incorrect in deeming that the allocation of the site in this plan would be premature. Indeed, the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it "has the potential be a high-quality site for local employment in a future local plan", thereby indicating that the perceived "considerable issues" associated with the site's delivery (considered below) can be overcome, but that the lead-in time until development proceeds would not render the site suitable for allocation. This is not accurate, as outlined below. It is not justified to pursue low growth for housing and employment land.

c)Not effective – The Local Plan will not deliver the housing need of the authority. As detailed in the Housing and Economic Growth Evidence and summarised below, the Council will fail to meet its five year housing land supply upon adoption of the Local Plan. With the requirement for Green Belt release established to even meet the low growth option, this suggests that it will not be possible to meet the shortage on windfall sites; as such, additional site/s need to be allocated; and

d)Not consistent with national policy – The social objective of the NPPF concerns "ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations". We consider that the Final Local Plan would not deliver a sufficient number of homes and therefore does not meet this fundamental requirement of sustainable development. The NPPF seeks for the planning system to help build a "strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure" (paragraph 8). The failure to allocate Talke Park represents a low growth scenario, which is not akin to a strong, responsive or competitive economy. Without this site, there would not be the right type of land in the right place to support businesses (considered below). The Council have acknowledged that Talke Parke is in a sustainable location and it therefore follows to allocate further housing and employment land in this location. Furthermore, the proposed length of the Local Plan is not long enough in line with national policy requirements. The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15-year period from adoption. The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. We consider the Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. Further detail is set out below.

#### THE COUNCIL'S APPROACH TO TALKE PARK (REF: TK30)

The Land off Talke Roundabout / A500 (Talke Park) was identified as one of three potential strategic locations in the First Draft Local Plan (ref: TK30), potentially capable of delivering new homes and employment land. One of the evidence base documents supporting that consultation, the Strategic Employment Site Assessment Report (April 2023), which was prepared by Aspinall Verdi, concluded that there is a clear regional rationale for the allocation of at least two Strategic Sites in Newcastle-under-Lyme (paragraph 11.5).

The Final Draft Local Plan proposes two of the three sites are allocated. Talke Park is not proposed for allocation, and is proposed to remain in the Green Belt. The evidence base for the Final Draft Local Plan includes the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi. This provides their professional opinion that there is a need for two Strategic Sites in the new local plan, which should be AB2 ('Land at J16 of the M6') and KL15 ('Land at Barkers Wood, (Keele University) Keele'). We consider that some of the assumptions made in reaching this conclusion are incorrect, and subsequently the summary of our case is that:

1)

There is a need for three strategic sites in order to meet the housing and employment needs of the area; and

2)

Talke Park is a deliverable, sustainable site, and its allocation would represent growth aligning with the NPPF and aspirations of the government.

#### HOUSING AND EMPLOYMENT NEED ASSESSMENT

Harworth and Graham Ward Farms Limited have commissioned WSP to undertake a series of analyses into the housing and economic growth options for Newcastle under Lyme, and the approach taken to informing the Local Plan. The findings are presented in the Housing and Economic Growth Evidence which highlights Talke Park's role in generating local employment opportunities and providing housing for existing and new residents of Newcastle under Lyme.

The report identifies flaws in the Council's approach which relies upon an overly optimistic housing supply pipeline to meet long-term needs, which may lead to potential housing shortfall in the long-term. The government's consultation on changes to the NPPF includes a standard methodology to housing need. Whilst the transitional arrangements may mean that the Local Plan is not assessed against this higher housing target, this approach would need to be applied once the Local Plan has been adopted in order to assess their five-year housing land supply, and could therefore render policies out of date.

The report also highlights the Council's under-appreciation of emerging employment land needs, which may limit the Borough's growth potential. The strategic need and economic life of properties for warehousing and logistic sectors is overlooked, and the fast-growing and emerging sectors that are not captured by traditional UK SIC sectors are under-appreciated. Talke Park can provide a strategic employment site and a different offer to the proposed strategic sites AB2 and KL15 which can bring a variety of opportunities to existing and future employers in the area.

#### DELIVERABILITY OF TALKE PARK (REF: TK30)

The Strategic Employment Sites Assessment – 2024 Update (June 2024) (herein 'SESA 2024'), prepared by Aspinall Verdi, concludes that there are "considerable issues to overcome" associated with the delivery



of Talke Park, and “there will be a long lead in period before any development takes place”, suggesting this renders an allocation premature. We consider the perceived “issues” would not prevent development or cause a significant delay. Whilst the site is not an immediate short-term opportunity in the Local Plan, it can be delivered in the plan period. Our response to the comments made are set out in Table 1, which should be read alongside the Vision Document and the supporting technical reports (Geo-environmental Desk Study; Highways Access Appraisal; Heritage Briefing Note; Note on Socio-economic Benefits; and Ecology and Landscaping Combined Technical Note). These were prepared in support of the submission to the previous First Draft Local Plan consultation and, whilst some changes have been made to the Indicative Proposed Masterplan since that submission, the assessments are still applicable and accurate. Note that the masterplan has been underpinned by significant technical work such as an earthworks cut and fill model to demonstrate that the site is deliverable and this indicative layout could be achieved. This establishes that the site can provide up to 390 new homes, and 95,500sqm (1m sqft) of employment floorspace (see attachment, table 1, Response to commentary in the Strategic Employment Sites Assessment – 2024 Update)

#### GREEN BELT

The main current constraint to the development of Talke Park is its location within the Green Belt. The preparation of a new Local Plan for Newcastle-under-Lyme presents an opportunity for this to be reviewed and the LPA has demonstrated exceptional circumstances to justify the release of land from the Green Belt in order to meet its development needs over the plan period.

Our previous representations submitted to the Draft Local Plan were supported by an Ecology and Landscaping Combined Technical Note, which set out the high-level baseline and opportunities and constraints to development within the Site.

The council has now published a Green Belt Assessment Part 4 (July 2024) which specifically assesses Talke Park (TK30), finding that it's development would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town. Whilst it finds that it would represent an incursion into undeveloped countryside, this would be the case for any greenfield site. The Assessment concludes that Talke Park (TK30) did not make a greater contribution to the purposes of the Green Belt than AB2 which is proposed for allocation; indeed TK30 is recommended to be taken forward for consideration, whilst AB2 is not. Its current Green Belt status cannot therefore be a reason for the non-allocation of Talke Park.

The letter from Tyler Grange dated 26 September 2024 provides a number of indicative visuals which demonstrate that development within the site will not obstruct views to and from the Wedgwood Monument, and that the Monument would continue to be seen as a distinct element on high ground separate from and raised above the development. The illustrative mitigation strategy in Appendix 1 demonstrates where opportunities existing to create visual and physical enclosure through the use of green infrastructure. This, together with careful use of cladding tones and designs will further reduce the visual impact of the proposed buildings in views to and from the monument.

In addition to the land at Chatterley Valley and Talke Park, Harworth is in control of additional land in the authority, namely land to the north of Peacock Hay Road (north of Chatterley Valley). A plan is provided at Appendix A (taken from a previous SHLAA assessment). This land, extending to 6.65ha and would be available to offer Biodiversity Offset and any Green Belt compensation land required in association with the allocation of land at Talke Park.

#### SITE DELIVERY TIMEFRAMES

The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi considers that Talke Park “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that if the potential issues associated with the site's delivery can be overcome (as the above table demonstrates is the case), it is the lead-in time until development proceeds which would render the site unsuitable for allocation. However, Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer (as considered below). The anticipated programme for delivery and rationale is set out below:

The key constraint to the development of the site, at this time, is its Green Belt designation. An application would not be progressed until the site were to be released from the Green Belt. Should this be proposed prior to the submission of the Local Plan for Examination, the following timeframe may be brought forward as pre-application discussions and surveys could be progressed with greater comfort that the allocation is likely to be brought forward;

Whilst the Local Development Scheme targets the adoption of the Local Plan in 2025 Q5, we anticipate that a more realistic target would be 2026 Q4. If this is the case, then an application could be progressed with the necessary surveys/ assessments and consultation, to lead to the submission of an outline or hybrid planning application by the end of 2027. Note the hybrid application approach was taken at Chatterley Valley to ensure full planning permission was secured for the earthworks, allowing them to get underway sooner. The application could be determined in 2028 Q2/ Q3;

Earthworks could then proceed with the submission of reserved matters application/s for the first phase/s in 2028 Q3/4. The application could be determined in 2029 Q2/ Q3;

The first units could then be constructed and available before the end of 2029. We would expect this to include the first homes;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 5-6 years for the employment units, which may run from 2029 to 2035. This would form a logical continuation of the anticipated construction and occupation programme at Chatterley Park, whereby it is envisaged this will be constructed and fully occupied by 2030;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 8 years for the homes, on the basis of 50 being delivered per year, which may run from 2029 to 2037;

Harworth and Graham Ward Farms Limited are confident that the site can be delivered within the Local Plan period, whether this be up to 2040, or indeed longer (as considered below).

In summary, Harworth and Graham Ward Farms Limited do not consider that the design, planning, earthworks and construction programme for the site will not prevent it from being delivered in the Local Plan period. Indeed, we do not anticipate that this would be significantly different to the delivery of proposed strategic site AB2 given its location, so the availability of employment space will be limited, warranting the allocation of Talke Park.

## BENEFITS

The allocation of Talke Park would:

Provide up to 390 new homes, housing needs/ growth;

Provide 95,500sqm (1m sqft)/ circa 21ha of employment floorspace, emp needs/ growth, providing up to 1,000 jobs in the construction phase and circa 3,600 permanent jobs once operational, of which around 1,000 would be taken by residents of Newcastle-Under-Lyme;

Meet local need for school places;

The Gross Value Added to the economy is estimated to be circa £15.3 million per year during the construction phase and £140 million per year during operation. It is also anticipated around £1.9 million per year in revenue would be generated through Council Tax and Business Rates receipts;

The location of Talke Park directly adjacent to the existing settlement limits offers clear benefits in terms of easy access to jobs, new homes, sustainable travel and green spaces. This local area would directly benefit from local expenditure of around £85,000 per year from the construction workforce over the construction phase, and around £5.3 million per year from the new residents;

Talke Park will promote sustainable communities, supporting improvements, connections and relationship with the wider area such as Wedgwood Monument;

Harworth and Graham Ward Farms Limited envisage the development to of high quality design and sustainability standards providing market leading approaches to ESG and Carbon Reduction, incorporating Net Zero design criteria and contributing to the delivery of Harworth's Net Zero Carbon Pathway2. This means that all commercial buildings Talke Park will be:

—Net Zero Carbon in operation (subject to occupier process requirements);

—Net Zero Carbon in construction and operation for any units build after 2030; and

—BREEAM Excellent.

## DURATION OF THE LOCAL PLAN PERIOD

The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15 year period from adoption, in order to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. It adds that, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area (as is the case here where two strategic sites are currently proposed for allocation), policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. The Local Plan is therefore at significant risk of not being consistent with national policy.

The Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

## CHANGES SOUGHT TO THE LOCAL PLAN

Harworth and Graham Ward Farms Limited seeks the allocation of TK30 as a Strategic Site, including the following:

Policy PSD1 – the inclusion of the site under point 3 as a strategic site “Land off Talke Roundabout / A500 to offer a sustainable urban extension providing a strategic employment location, new homes, and public space”.

Policy PSD5 – the site should be listed for removal from the Green Belt.

Update to Policy PSD3 – the figures in terms of housing and employment provision should be updated to account for the allocation of TK30.

Addition of a new Policy TK30 relating to the site's development. A suggested policy is provided below, which we would be happy to discuss further.

Policy TK30 ‘Land off Talke Roundabout / A500’

Land off Talke Roundabout / A500 is allocated as a sustainable urban extension providing employment land, new homes and public space. The site extends to circa 66 hectares and is allocated for uses including circa 390 new homes and 21 hectares (circa 95,500 sqm of floorspace) of employment land. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses and industrial processes. Development will be permitted subject to:

- 1.Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2.Safe and convenient access into the development via a new access on Talke Road for the employment development and provision of two access points on Deans Lane for the residential development,
- 3.In line with Policy SA1 (General Requirements), a masterplan and design code should be prepared and agreed for the site which will:

a.Consider sustainable travel links including cycle and pedestrian connectivity including to public transport links. Development should also consider walking and active travel for health and wellbeing purposes within the site,

b.provide for appropriate boundary treatments to the existing Green Belt,

c.Facilitate improvements to local footpaths and linkages to Wedgwood Monument

d.Achieve high quality design reflecting the landscape location of the site and creating a vibrant destination and attractive public realm. This should recognise the transitional location between the higher density urban and rural area,

e.Ensure the layout and development of the site is landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area including the Wedgwood Monument.

4.Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy,

5.Submission of a drainage strategy,

6.Appropriate measures to control impact of increased traffic movement or uses within the site on local amenity including noise and air quality on the surrounding area. This should include submission of a noise and air quality assessment and mitigation strategy,



	<p>7.Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Wedgwood Monument,</p> <p>8.Financial contributions to improvements in the capacity of local schools and health facilities.</p> <p>9.Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site.</p> <p>10.Employment units to achieve at least BREEAM excellent standard with an aim for the most recent BREEAM outstanding standard,</p> <p>11.Retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. Strengthened boundaries to the site, comprising landscape buffers, and the creation of new strong, defensible boundaries to the Green Belt,</p> <p>12.The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement.</p> <p>We also consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.</p> <p><b>CONCLUSION</b></p> <p>We consider that, in its current form, the Final Draft Local Plan is not sound, on the basis that it is (1) not positively prepared, (2) not justified, and (3) not consistent with national policy. We consider that the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. Harworth and Graham Ward Farms Limited are in control of the site and would therefore lead its design and delivery, as per Chatterley Park. Exceptional circumstances have been demonstrated to justify the release of land from the Green Belt. Allocating Talke Park would meet the Council's growth aspirations in terms of delivering sustainable new homes and jobs, meeting local needs and providing more economic opportunities for residents of Newcastle-under-Lyme. Harworth is an experienced land and property regeneration company which is currently investing in Newcastle under Lyme at the nearby Chatterley Valley site. The above commentary demonstrates why the site is suitable and available for allocation, notably:</p> <p>The Council's own evidence base supports the allocation of the site. The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it "has the potential be a high-quality site for local employment [albeit] in a future local plan". There is therefore recognition that the perceived issues associated with the site's delivery can be overcome, but the Council are uncertain on programme.</p> <p>The SWECO report which forms part of the evidence base notes that the Talke Site has the best walking accessibility score of the three potential strategic sites. That SWECO report, and Mosodi's independent assessment of the site, confirm that there are no highways or accessibility constraints to prevent the site being allocated.</p> <p>The council's Green Belt Assessment Part 4 (July 2024) concludes that the development of Talke Park would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town.</p> <p>Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer.</p>
<b>Q7 Modification</b>	We consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. We consider that the allocation of site ref: TK30 (the Land off Talke Roundabout / A500), as a strategic location, for housing and employment would resolve the soundness matters outlined at 6 above. Further detail is provided in the supporting covering letter.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In order to accurately outline our client's position and aid the Inspector in providing any further information relating to site TK30, on the basis we consider the allocation of the site would resolve our concerns about the Local Plan being unsound.
<b>Attachments</b>	<a href="#">1300486 Harworth Talke Cover Letter.pdf</a> <a href="#">1300486 Harworth APP 1 Vision Docs.pdf</a> <a href="#">1300486 Harworth APP2 Technical documents.pdf</a>
<b>Comment ID</b>	NULLP1029
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Harworth Group PLC
<b>Consultee Given Name</b>	Harworth Group
<b>Agent Company / Organisation</b>	WSP
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Stocks
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	We consider that the Local Plan is not sound on the basis that it is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. The Local Plan as drafted fails to

provide sufficient housing and employment land, and the proposed length of the Local Plan is not long enough in line with national policy requirements. Our rationale is set out in the supporting covering letter.

This representation is submitted on behalf of Harworth Group PLC (herein "Harworth") and Graham Ward Farms Limited to the Newcastle-under-Lyme Borough Council Final Draft Local Plan. This letter provides our comments as referenced in the completed Representation Form, in support of our response to questions 6 and 7 regarding the soundness of the Local Plan. Our comments go to the heart of the Local Plan and, whilst our Representation Form notes this relates to Policy PSD1: Overall Development Strategy, our amendments sought would require updates across the Local Plan document and Proposals Map.

The specific matter which we dispute is the council's proposed approach to allocate two strategic employment sites (ref: AB2 - 'Land adjoining corner of A500 and M6 Southbound' and ref: KL15 - 'Land South of A525 between Keele University and Newcastle') and not 'Land off Talke Roundabout / A500', which was previously assessed in the Local Plan preparation under ref: TK30. We also consider the Local Plan does not cover a sufficient period of time. The Local Plan as drafted fails to provide sufficient housing and employment land. As such, we consider that the proposed approach to the Local Plan is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. We consider that the extension of the Local Plan duration to 2042 as a minimum or ideally 2045, and the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. We request that the council consider the contents of this letter and update the Local Plan prior to the submission for Examination. Otherwise, we would request that these comments are passed to the Planning Inspector(s).

In addition to this letter and our completed representation form, this submission is supported by the following documentation:

- Updated Vision Document (October 2024);
- Updated Indicative Proposed Masterplan;
- Housing and Economic Growth Evidence (October 2024);
- Letter from Wendy Lancaster at Tyler Grange, with enclosed Accurate Visual Representations, dated 30th September 2024;
- Geo-environmental Desk Study (August 2023);
- Highways Access Appraisal (August 2023);
- Heritage Briefing Note (August 2023);
- Note on Socio-economic Benefits; and
- Ecology and Landscaping Combined Technical Note (August 2023).

Appended to this letter is a plan of land to the north of Peacock Hay Road, which is also within Harworth's ownership, demonstrating that they have available land in the authority to compensate for the removal of this site from the Green Belt and contribute towards biodiversity net gain.

#### HARWORTH GROUP PLC

Harworth is one of the leading land and property regeneration companies in the UK, owning and managing c.16,000 acres on c.100 sites in the North of England and the Midlands. The company originated as the property division of UK Coal and is therefore an expert at dealing with complex sites with abnormal ground conditions and topography.

Harworth is one of the key developers presently working in Newcastle under Lyme, currently delivering 'Chatterley Park' (previously referred to as 'Chatterley Valley' prior to the commencement of development), which is the authority's Regional Investment Site, and less than 1km from 'Talke Park'. Harworth fully acquired the land forming Chatterley Park in August 2017, and has subsequently secured planning permissions to allow earthworks to progress, with 1.2m sqft of industrial and logistics floorspace set to come forward, creating around 1,700 jobs.

At Chatterley Park, Harworth has received significant interest from large national and international businesses attracted by the central location, access to the motorway network and ability to service major conurbations in all of the North West, East and West Midlands. There has been a range of occupiers with an interest for a variety of unit sizes. Harworth have also identified interest for "mid-box" (50,000 – 150,000 sqft) units and smaller units (20,000 – 50,000 sqft) and a pent-up demand for an underserved and important segment of the market.

Whilst the larger and "mid box" units do attract distribution warehouses, there is range of occupiers with an interest in the range of unit sizes:

- national/international logistics companies;
- a pharmaceutical distributor;
- manufacturing businesses;
- a bespoke requirement for glass manufacturing;
- a vehicle preparation centre for an automotive occupier; and
- a local business in the medical field, looking to amalgamate operations across the North West centrally to the Stoke/Newcastle area.

The interest across all unit sizes includes occupiers looking to replace older premises, secure larger premises to align with growth of their business and/or amalgamate operations. This includes local businesses and national/ international businesses including one looking for a hub to service the north of England.

Talke Park is the logical extension/ next step to Chatterley Park in terms of its proximity to both that site and the strategic road network. The sites have a similar industrial history and topography, neither of which are deemed to be constraints by Harworth and Graham Ward Farms Limited to their proposed redevelopment of either site.

Harworth's proven track record in the area and strong relationship with stakeholders (including the Councils and potential occupiers) demonstrates that, in partnership with Graham Ward Farms Limited, it can deliver Talke Park and its associated benefits within the plan period. Harworth has an extensive track record of delivering large-scale employment, residential and mixed-use developments. Further information is provided in the submitted Vision document.

#### TESTS OF SOUNDNESS

In order to be deemed sound, paragraph 35 of the NPPF (2023) states that a Local Plan must be:

a)Positively prepared – this strategy must, as a minimum, meet the area's objectively assessed needs. Paragraph 16 adds that a Local Plan should be “aspirational but deliverable”. The government has recently closed its consultation on updates to the NPPF. Whilst the transitional arrangements may mean that the Local Plan is examined under the currently adopted NPPF, the Government has made it clear through their consultation that “sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people”<sup>1</sup>.

b)Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c)Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d)Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

#### SUMMARY ASSESSMENT AGAINST THE TESTS OF SOUNDNESS

We contest that the ‘Final Local Plan’ is:

a)Not positively prepared – The allocation of two strategic sites is a low growth option and does not present an aspirational strategy. At a time when housing delivery is critical (evidenced by the government's proposed reforms to the planning system to make the standard method for assessing housing needs mandatory) and economic growth is deemed essential to improving prosperity and living standards, the LPA should be pursuing an ambitious strategy. In order to be positively prepared and “aspirational”, the Council should target high growth scenarios, so far as any site allocations and policies are deliverable. The draft Local Plan fails to provide sufficient homes and does not plan for all types of employment growth. The Final Draft Local Plan proposes to allocate two strategic employment sites, which are aimed at different uses (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks

to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University). The overall delivery for industrial and logistics sites is therefore very low and limited. In terms of housing, the Local Plan should allocate additional sites to meet the housing need and this would also allow for delays to sites coming forward.

b)Not justified – In the context of the above, we do not consider that the proposal represents an appropriate strategy, when a reasonable alternative would be to allocate ‘Talke Park’ (ref: TK30) as a strategic location, increasing housing numbers and employment land. The council's evidence base is flawed, and the conclusions reached are incorrect in deeming that the allocation of the site in this plan would be premature. Indeed, the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that the perceived “considerable issues” associated with the site's delivery (considered below) can be overcome, but that the lead-in time until development proceeds would not render the site suitable for allocation. This is not accurate, as outlined below. It is not justified to pursue low growth for housing and employment land.

c)Not effective – The Local Plan will not deliver the housing need of the authority. As detailed in the Housing and Economic Growth Evidence and summarised below, the Council will fail to meet its five year housing land supply upon adoption of the Local Plan. With the requirement for Green Belt release established to even meet the low growth option, this suggests that it will not be possible to meet the shortage on windfall sites; as such, additional site/s need to be allocated; and

d)Not consistent with national policy – The social objective of the NPPF concerns “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”. We consider that the Final Local Plan would not deliver a sufficient number of homes and therefore does not meet this fundamental requirement of sustainable development. The NPPF seeks for the planning system to help build a “strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure” (paragraph 8). The failure to allocate Talke Park represents a low growth scenario, which is not akin to a strong, responsive or competitive economy. Without this site, there would not be the right type of land in the right place to support businesses (considered below). The Council have acknowledged that Talke Parke is in a sustainable location and it therefore follows to allocate further housing and employment land in this location. Furthermore, the proposed length of the Local Plan is not long enough in line with national policy requirements. The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15-year period from adoption. The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. We consider the Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. Further detail is set out below.

#### THE COUNCIL'S APPROACH TO TALKE PARK (REF: TK30)

The Land off Talke Roundabout / A500 (Talke Park) was identified as one of three potential strategic locations in the First Draft Local Plan (ref: TK30), potentially capable of delivering new homes and employment land. One of the evidence base documents supporting that consultation, the Strategic Employment Site Assessment Report (April 2023), which was prepared by Aspinall Verdi, concluded that there is a clear regional rationale for the allocation of at least two Strategic Sites in Newcastle-under-Lyme (paragraph 11.5).

The Final Draft Local Plan proposes two of the three sites are allocated. Talke Park is not proposed for allocation, and is proposed to remain in the Green Belt. The evidence base for the Final Draft Local Plan includes the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi. This provides their professional opinion that there is a need for two Strategic Sites in the new local plan, which should be AB2 (‘Land at J16 of the M6’) and KL15 (‘Land at Barkers Wood, (Keele University) Keele’). We consider that some of the assumptions made in reaching this conclusion are incorrect, and subsequently the summary of our case is that:

1)

There is a need for three strategic sites in order to meet the housing and employment needs of the area; and

2)

Talke Park is a deliverable, sustainable site, and its allocation would represent growth aligning with the NPPF and aspirations of the government.

#### HOUSING AND EMPLOYMENT NEED ASSESSMENT

Harworth and Graham Ward Farms Limited have commissioned WSP to undertake a series of analyses into the housing and economic growth options for Newcastle under Lyme, and the approach taken to informing the Local Plan. The findings are presented in the Housing and Economic Growth Evidence which highlights Talke Park's role in generating local employment opportunities and providing housing for existing and new residents of Newcastle under Lyme.

The report identifies flaws in the Council's approach which relies upon an overly optimistic housing supply pipeline to meet long-term needs, which may lead to potential housing shortfall in the long-term. The government's consultation on changes to the NPPF includes a standard methodology to housing need. Whilst the transitional arrangements may mean that the Local Plan is not assessed against this higher housing target, this approach would need to be applied once the Local Plan has been adopted in order to assess their five-year housing land supply, and could therefore render policies out of date.

The report also highlights the Council's under-appreciation of emerging employment land needs, which may limit the Borough's growth potential. The strategic need and economic life of properties for warehousing and logistic sectors is overlooked, and the fast-growing and emerging sectors that are not captured by traditional UK SIC sectors are under-appreciated. Talke Park can provide a strategic employment site and a different offer to the proposed strategic sites AB2 and KL15 which can bring a variety of opportunities to existing and future employers in the area.

#### DELIVERABILITY OF TALKE PARK (REF: TK30)

The Strategic Employment Sites Assessment – 2024 Update (June 2024) (herein 'SESA 2024'), prepared by Aspinall Verdi, concludes that there are "considerable issues to overcome" associated with the delivery of Talke Park, and "there will be a long lead in period before any development takes place", suggesting this renders an allocation premature. We consider the perceived "issues" would not prevent development or cause a significant delay. Whilst the site is not an immediate short-term opportunity in the Local Plan, it can be delivered in the plan period. Our response to the comments made are set out in Table 1, which should be read alongside the Vision Document and the supporting technical reports (Geo-environmental Desk Study; Highways Access Appraisal; Heritage Briefing Note; Note on Socio-economic Benefits; and Ecology and Landscaping Combined Technical Note). These were prepared in support of the submission to the previous First Draft Local Plan consultation and, whilst some changes have been made to the Indicative Proposed Masterplan since that submission, the assessments are still applicable and accurate. Note that the masterplan has been underpinned by significant technical work such as an earthworks cut and fill model to demonstrate that the site is deliverable and this indicative layout could be achieved.

This establishes that the site can provide up to 390 new homes, and 95,500sqm (1m sqft) of employment floorspace (see attachment, table 1, Response to commentary in the Strategic Employment Sites Assessment – 2024 Update)

#### GREEN BELT

The main current constraint to the development of Talke Park is its location within the Green Belt. The preparation of a new Local Plan for Newcastle-under-Lyme presents an opportunity for this to be reviewed and the LPA has demonstrated exceptional circumstances to justify the release of land from the Green Belt in order to meet its development needs over the plan period.

Our previous representations submitted to the Draft Local Plan were supported by an Ecology and Landscaping Combined Technical Note, which set out the high-level baseline and opportunities and constraints to development within the Site.

The council has now published a Green Belt Assessment Part 4 (July 2024) which specifically assesses Talke Park (TK30), finding that its development would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town. Whilst it finds that it would represent an incursion into undeveloped countryside, this would be the case for any greenfield site. The Assessment concludes that Talke Park (TK30) did not make a greater contribution to the purposes of the Green Belt than AB2 which is proposed for allocation; indeed TK30 is recommended to be taken forward for consideration, whilst AB2 is not. Its current Green Belt status cannot therefore be a reason for the non-allocation of Talke Park.

The letter from Tyler Grange dated 26 September 2024 provides a number of indicative visuals which demonstrate that development within the site will not obstruct views to and from the Wedgwood Monument, and that the Monument would continue to be seen as a distinct element on high ground separate from and raised above the development. The illustrative mitigation strategy in Appendix 1 demonstrates where opportunities existing to create visual and physical enclosure through the use of green infrastructure. This, together with careful use of cladding tones and designs will further reduce the visual impact of the proposed buildings in views to and from the monument.

In addition to the land at Chatterley Valley and Talke Park, Harworth is in control of additional land in the authority, namely land to the north of Peacock Hay Road (north of Chatterley Valley). A plan is provided at Appendix A (taken from a previous SHLAA assessment). This land, extending to 6.65ha and would be available to offer Biodiversity Offset and any Green Belt compensation land required in association with the allocation of land at Talke Park.

#### SITE DELIVERY TIMEFRAMES

The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi considers that Talke Park "has the potential be a high-quality site for local employment in a future local plan", thereby indicating that if the potential issues associated with the site's delivery can be overcome (as the above table demonstrates is the case), it is the lead-in time until development proceeds which would render the site unsuitable for allocation. However, Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer (as considered below). The anticipated programme for delivery and rationale is set out below:

The key constraint to the development of the site, at this time, is its Green Belt designation. An application would not be progressed until the site were to be released from the Green Belt. Should this be proposed



prior to the submission of the Local Plan for Examination, the following timeframe may be brought forward as pre-application discussions and surveys could be progressed with greater comfort that the allocation is likely to be brought forward;

Whilst the Local Development Scheme targets the adoption of the Local Plan in 2025 Q5, we anticipate that a more realistic target would be 2026 Q4. If this is the case, then an application could be progressed with the necessary surveys/ assessments and consultation, to lead to the submission of an outline or hybrid planning application by the end of 2027. Note the hybrid application approach was taken at Chatterley Valley to ensure full planning permission was secured for the earthworks, allowing them to get underway sooner. The application could be determined in 2028 Q2/ Q3;

Earthworks could then proceed with the submission of reserved matters application/s for the first phase/s in 2028 Q3/4. The application could be determined in 2029 Q2/ Q3;

The first units could then be constructed and available before the end of 2029. We would expect this to include the first homes;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 5-6 years for the employment units, which may run from 2029 to 2035. This would form a logical continuation of the anticipated construction and occupation programme at Chatterley Park, whereby it is envisaged this will be constructed and fully occupied by 2030;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 8 years for the homes, on the basis of 50 being delivered per year, which may run from 2029 to 2037;

Harworth and Graham Ward Farms Limited are confident that the site can be delivered within the Local Plan period, whether this be up to 2040, or indeed longer (as considered below).

In summary, Harworth and Graham Ward Farms Limited do not consider that the design, planning, earthworks and construction programme for the site will not prevent it from being delivered in the Local Plan period. Indeed, we do not anticipate that this would be significantly different to the delivery of proposed strategic site AB2 given its location, so the availability of employment space will be limited, warranting the allocation of Talke Park.

#### **BENEFITS**

The allocation of Talke Park would:

Provide up to 390 new homes, housing needs/ growth;

Provide 95,500sqm (1m sqft)/ circa 21ha of employment floorspace, emp needs/ growth, providing up to 1,000 jobs in the construction phase and circa 3,600 permanent jobs once operational, of which around 1,000 would be taken by residents of Newcastle-Under-Lyme;

Meet local need for school places;

The Gross Value Added to the economy is estimated to be circa £15.3 million per year during the construction phase and £140 million per year during operation. It is also anticipated around £1.9 million per year in revenue would be generated through Council Tax and Business Rates receipts;

The location of Talke Park directly adjacent to the existing settlement limits offers clear benefits in terms of easy access to jobs, new homes, sustainable travel and green spaces. This local area would directly benefit from local expenditure of around £85,000 per year from the construction workforce over the construction phase, and around £5.3 million per year from the new residents;

Talke Park will promote sustainable communities, supporting improvements, connections and relationship with the wider area such as Wedgwood Monument;

Harworth and Graham Ward Farms Limited envisage the development to of high quality design and sustainability standards providing market leading approaches to ESG and Carbon Reduction, incorporating Net Zero design criteria and contributing to the delivery of Harworth's Net Zero Carbon Pathway2. This means that all commercial buildings Talke Park will be:

—Net Zero Carbon in operation (subject to occupier process requirements);

—Net Zero Carbon in construction and operation for any units build after 2030; and

—BREEAM Excellent.

#### **DURATION OF THE LOCAL PLAN PERIOD**

The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15 year period from adoption, in order to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. It adds that, where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area (as is the case here where two strategic sites are currently proposed for allocation), policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. The Local Plan is therefore at significant risk of not being consistent with national policy.

The Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

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Policy PSD5 – the site should be listed for removal from the Green Belt.

Update to Policy PSD3 – the figures in terms of housing and employment provision should be updated to account for the allocation of TK30.

Addition of a new Policy TK30 relating to the site's development. A suggested policy is provided below, which we would be happy to discuss further.

Policy TK30 'Land off Talke Roundabout / A500'

	<p>Land off Talke Roundabout / A500 is allocated as a sustainable urban extension providing employment land, new homes and public space. The site extends to circa 66 hectares and is allocated for uses including circa 390 new homes and 21 hectares (circa 95,500 sqm of floorspace) of employment land. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses and industrial processes. Development will be permitted subject to:</p> <ol style="list-style-type: none"> <li>1.Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),</li> <li>2.Safe and convenient access into the development via a new access on Talke Road for the employment development and provision of two access points on Deans Lane for the residential development,</li> <li>3.In line with Policy SA1 (General Requirements), a masterplan and design code should be prepared and agreed for the site which will: <ol style="list-style-type: none"> <li>a.Consider sustainable travel links including cycle and pedestrian connectivity including to public transport links. Development should also consider walking and active travel for health and wellbeing purposes within the site,</li> <li>b.provide for appropriate boundary treatments to the existing Green Belt,</li> <li>c.Facilitate improvements to local footpaths and linkages to Wedgwood Monument</li> <li>d.Achieve high quality design reflecting the landscape location of the site and creating a vibrant destination and attractive public realm. This should recognise the transitional location between the higher density urban and rural area,</li> <li>e.Ensure the layout and development of the site is landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area including the Wedgwood Monument.</li> </ol> </li> <li>4.Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy,</li> <li>5.Submission of a drainage strategy,</li> <li>6.Appropriate measures to control impact of increased traffic movement or uses within the site on local amenity including noise and air quality on the surrounding area. This should include submission of a noise and air quality assessment and mitigation strategy,</li> <li>7.Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Wedgwood Monument,</li> <li>8.Financial contributions to improvements in the capacity of local schools and health facilities.</li> <li>9.Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site.</li> <li>10.Employment units to achieve at least BREEAM excellent standard with an aim for the most recent BREEAM outstanding standard,</li> <li>11.Retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. Strengthened boundaries to the site, comprising landscape buffers, and the creation of new strong, defensible boundaries to the Green Belt,</li> <li>12.The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement.</li> </ol> <p>We also consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.</p> <p><b>CONCLUSION</b></p> <p>We consider that, in its current form, the Final Draft Local Plan is not sound, on the basis that it is (1) not positively prepared, (2) not justified, and (3) not consistent with national policy. We consider that the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. Harworth and Graham Ward Farms Limited are in control of the site and would therefore lead its design and delivery, as per Chatterley Park. Exceptional circumstances have been demonstrated to justify the release of land from the Green Belt. Allocating Talke Park would meet the Council's growth aspirations in terms of delivering sustainable new homes and jobs, meeting local needs and providing more economic opportunities for residents of Newcastle-under-Lyme. Harworth is an experienced land and property regeneration company which is currently investing in Newcastle under Lyme at the nearby Chatterley Valley site. The above commentary demonstrates why the site is suitable and available for allocation, notably:</p> <p>The Council's own evidence base supports the allocation of the site. The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it "has the potential be a high-quality site for local employment [albeit] in a future local plan". There is therefore recognition that the perceived issues associated with the site's delivery can be overcome, but the Council are uncertain on programme.</p> <p>The SWECO report which forms part of the evidence base notes that the Talke Site has the best walking accessibility score of the three potential strategic sites. That SWECO report, and Mosodi's independent assessment of the site, confirm that there are no highways or accessibility constraints to prevent the site being allocated.</p> <p>The council's Green Belt Assessment Part 4 (July 2024) concludes that the development of Talke Park would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town.</p> <p>Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer.</p>
<b>Q7 Modification</b>	<p>We consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. We consider that the allocation of site ref: TK30 (the Land off Talke Roundabout / A500), as a strategic location, for housing and employment would resolve the soundness matters outlined at 6 above. Further detail is provided in the supporting covering letter.</p>
<b>Q8 Hearing attendance</b>	<p>Yes, I wish to participate in hearing session(s)</p>
<b>Q9 Hearing reasons</b>	<p>In order to accurately outline our client's position and aid the Inspector in providing any further information relating to site TK30, on the basis we consider the allocation of the site would resolve our concerns about the Local Plan being unsound.</p>



<b>Attachments</b>	<a href="#">1300486 Harworth APP 1 Vision Docs.pdf</a> <a href="#">1300486 Harworth Talke Cover Letter.pdf</a> <a href="#">1300486 Harworth APP2 Technical documents.pdf</a>
<b>Comment ID</b>	NULLP1021
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Harworth Group PLC
<b>Consultee Given Name</b>	Harworth Group
<b>Agent Company / Organisation</b>	WSP
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Stocks
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We consider that the Local Plan is not sound on the basis that it is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. The Local Plan as drafted fails to provide sufficient housing and employment land, and the proposed length of the Local Plan is not long enough in line with national policy requirements. Our rationale is set out in the supporting covering letter.</p> <p>This representation is submitted on behalf of Harworth Group PLC (herein "Harworth") and Graham Ward Farms Limited to the Newcastle-under-Lyme Borough Council Final Draft Local Plan. This letter provides our comments as referenced in the completed Representation Form, in support of our response to questions 6 and 7 regarding the soundness of the Local Plan. Our comments go to the heart of the Local Plan and, whilst our Representation Form notes this relates to Policy PSD1: Overall Development Strategy, our amendments sought would require updates across the Local Plan document and Proposals Map.</p> <p>The specific matter which we dispute is the council's proposed approach to allocate two strategic employment sites (ref: AB2 - 'Land adjoining corner of A500 and M6 Southbound' and ref: KL15 - 'Land South of A525 between Keele University and Newcastle') and not 'Land off Talke Roundabout / A500', which was previously assessed in the Local Plan preparation under ref: TK30. We also consider the Local Plan does not cover a sufficient period of time. The Local Plan as drafted fails to provide sufficient housing and employment land. As such, we consider that the proposed approach to the Local Plan is (1) not positively prepared, (2) not justified, (3) not effective, and (4) not consistent with national policy. We consider that the extension of the Local Plan duration to 2042 as a minimum or ideally 2045, and the allocation of 'Land off Talke Roundabout / A500' (herein 'Talke Park') would resolve this soundness matter. We request that the council consider the contents of this letter and update the Local Plan prior to the submission for Examination. Otherwise, we would request that these comments are passed to the Planning Inspector(s).</p> <p>In addition to this letter and our completed representation form, this submission is supported by the following documentation:</p> <ul style="list-style-type: none"> <li>Updated Vision Document (October 2024);</li> <li>Updated Indicative Proposed Masterplan;</li> <li>Housing and Economic Growth Evidence (October 2024);</li> <li>Letter from Wendy Lancaster at Tyler Grange, with enclosed Accurate Visual Representations, dated 30th September 2024;</li> <li>Geo-environmental Desk Study (August 2023);</li> <li>Highways Access Appraisal (August 2023);</li> <li>Heritage Briefing Note (August 2023);</li> <li>Note on Socio-economic Benefits; and</li> <li>Ecology and Landscaping Combined Technical Note (August 2023).</li> </ul> <p>Appended to this letter is a plan of land to the north of Peacock Hay Road, which is also within Harworth's ownership, demonstrating that they have available land in the authority to compensate for the removal of this site from the Green Belt and contribute towards biodiversity net gain.</p> <p><b>HARWORTH GROUP PLC</b></p> <p>Harworth is one of the leading land and property regeneration companies in the UK, owning and managing c.16,000 acres on c.100 sites in the North of England and the Midlands. The company originated as the property division of UK Coal and is therefore an expert at dealing with complex sites with abnormal ground conditions and topography.</p> <p>Harworth is one of the key developers presently working in Newcastle under Lyme, currently delivering 'Chatterley Park' (previously referred to as 'Chatterley Valley' prior to the commencement of development), which is the authority's Regional Investment Site, and less than 1km from 'Talke Park'. Harworth fully acquired the land forming Chatterley Park in August 2017, and has subsequently secured planning permissions to allow earthworks to progress, with 1.2m sqft of industrial and logistics floorspace set to come forward, creating around 1,700 jobs.</p> <p>At Chatterley Park, Harworth has received significant interest from large national and international businesses attracted by the central location, access to the motorway network and ability to service major conurbations in all of the North West, East and West Midlands. There has been a range of occupiers with an interest for a variety of unit sizes. Harworth have also identified interest for "mid-box" (50,000 –</p>

150,000 sqft) units and smaller units (20,000 – 50,000 sqft) and a pent-up demand for an underserved and important segment of the market.

Whilst the larger and “mid box” units do attract distribution warehouses, there is range of occupiers with an interest in the range of unit sizes:

- national/international logistics companies;
- a pharmaceutical distributor;
- manufacturing businesses;
- a bespoke requirement for glass manufacturing;
- a vehicle preparation centre for an automotive occupier; and
- a local business in the medical field, looking to amalgamate operations across the North West centrally to the Stoke/Newcastle area.

The interest across all unit sizes includes occupiers looking to replace older premises, secure larger premises to align with growth of their business and/or amalgamate operations. This includes local businesses and national/ international businesses including one looking for a hub to service the north of England.

Talke Park is the logical extension/ next step to Chatterley Park in terms of its proximity to both that site and the strategic road network. The sites have a similar industrial history and topography, neither of which are deemed to be constraints by Harworth and Graham Ward Farms Limited to their proposed redevelopment of either site.

Harworth’s proven track record in the area and strong relationship with stakeholders (including the Councils and potential occupiers) demonstrates that, in partnership with Graham Ward Farms Limited, it can deliver Talke Park and its associated benefits within the plan period. Harworth has an extensive track record of delivering large-scale employment, residential and mixed-use developments. Further information is provided in the submitted Vision document.

#### TESTS OF SOUNDNESS

In order to be deemed sound, paragraph 35 of the NPPF (2023) states that a Local Plan must be:

a)Positively prepared – this strategy must, as a minimum, meet the area’s objectively assessed needs. Paragraph 16 adds that a Local Plan should be “aspirational but deliverable”. The government has recently closed its consultation on updates to the NPPF. Whilst the transitional arrangements may mean that the Local Plan is examined under the currently adopted NPPF, the Government has made it clear through their consultation that “sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people”<sup>1</sup>.

b)Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c)Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d)Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

#### SUMMARY ASSESSMENT AGAINST THE TESTS OF SOUNDNESS

We contest that the ‘Final Local Plan’ is:

a)Not positively prepared – The allocation of two strategic sites is a low growth option and does not present an aspirational strategy. At a time when housing delivery is critical (evidenced by the government’s proposed reforms to the planning system to make the standard method for assessing housing needs mandatory) and economic growth is deemed essential to improving prosperity and living standards, the LPA should be pursuing an ambitious strategy. In order to be positively prepared and “aspirational”, the Council should target high growth scenarios, so far as any site allocations and policies are deliverable. The draft Local Plan fails to provide sufficient homes and does not plan for all types of employment growth. The Final Draft Local Plan proposes to allocate two strategic employment sites, which are aimed at different uses (AB2 seeks to support a sub-regional logistics focused employment development and KL15 seeks

to support the expansion of the existing science park and create an innovation zone, linked to research and innovation of Keele University). The overall delivery for industrial and logistics sites is therefore very low and limited. In terms of housing, the Local Plan should allocate additional sites to meet the housing need and this would also allow for delays to sites coming forward.

b)Not justified – In the context of the above, we do not consider that the proposal represents an appropriate strategy, when a reasonable alternative would be to allocate ‘Talke Park’ (ref: TK30) as a strategic location, increasing housing numbers and employment land. The council’s evidence base is flawed, and the conclusions reached are incorrect in deeming that the allocation of the site in this plan would be premature. Indeed, the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that the perceived “considerable issues” associated with the site’s delivery (considered below) can be overcome, but that the lead-in time until development proceeds would not render the site suitable for allocation. This is not accurate, as outlined below. It is not justified to pursue low growth for housing and employment land.

c)Not effective – The Local Plan will not deliver the housing need of the authority. As detailed in the Housing and Economic Growth Evidence and summarised below, the Council will fail to meet its five year housing land supply upon adoption of the Local Plan. With the requirement for Green Belt release established to even meet the low growth option, this suggests that it will not be possible to meet the shortage on windfall sites; as such, additional site/s need to be allocated; and

d)Not consistent with national policy – The social objective of the NPPF concerns “ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations”. We consider that the Final Local Plan would not deliver a sufficient number of homes and therefore does not meet this fundamental requirement of sustainable development. The NPPF seeks for the planning system to help build a “strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure” (paragraph 8). The failure to allocate Talke Park represents a low growth scenario, which is not akin to

a strong, responsive or competitive economy. Without this site, there would not be the right type of land in the right place to support businesses (considered below). The Council have acknowledged that Talke Parke is in a sustainable location and it therefore follows to allocate further housing and employment land in this location. Furthermore, the proposed length of the Local Plan is not long enough in line with national policy requirements. The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15-year period from adoption. The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. We consider the Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. Further detail is set out below.

#### THE COUNCIL'S APPROACH TO TALKE PARK (REF: TK30)

The Land off Talke Roundabout / A500 (Talke Park) was identified as one of three potential strategic locations in the First Draft Local Plan (ref: TK30), potentially capable of delivering new homes and employment land. One of the evidence base documents supporting that consultation, the Strategic Employment Site Assessment Report (April 2023), which was prepared by Aspinall Verdi, concluded that there is a clear regional rationale for the allocation of at least two Strategic Sites in Newcastle-under-Lyme (paragraph 11.5).

The Final Draft Local Plan proposes two of the three sites are allocated. Talke Park is not proposed for allocation, and is proposed to remain in the Green Belt. The evidence base for the Final Draft Local Plan includes the Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi. This provides their professional opinion that there is a need for two Strategic Sites in the new local plan, which should be AB2 ('Land at J16 of the M6') and KL15 ('Land at Barkers Wood, (Keele University) Keele'). We consider that some of the assumptions made in reaching this conclusion are incorrect, and subsequently the summary of our case is that:

1)

There is a need for three strategic sites in order to meet the housing and employment needs of the area; and

2)

Talke Park is a deliverable, sustainable site, and its allocation would represent growth aligning with the NPPF and aspirations of the government.

#### HOUSING AND EMPLOYMENT NEED ASSESSMENT

Harworth and Graham Ward Farms Limited have commissioned WSP to undertake a series of analyses into the housing and economic growth options for Newcastle under Lyme, and the approach taken to informing the Local Plan. The findings are presented in the Housing and Economic Growth Evidence which highlights Talke Park's role in generating local employment opportunities and providing housing for existing and new residents of Newcastle under Lyme.

The report identifies flaws in the Council's approach which relies upon an overly optimistic housing supply pipeline to meet long-term needs, which may lead to potential housing shortfall in the long-term. The government's consultation on changes to the NPPF includes a standard methodology to housing need. Whilst the transitional arrangements may mean that the Local Plan is not assessed against this higher housing target, this approach would need to be applied once the Local Plan has been adopted in order to assess their five-year housing land supply, and could therefore render policies out of date.

The report also highlights the Council's under-appreciation of emerging employment land needs, which may limit the Borough's growth potential. The strategic need and economic life of properties for warehousing and logistic sectors is overlooked, and the fast-growing and emerging sectors that are not captured by traditional UK SIC sectors are under-appreciated. Talke Park can provide a strategic employment site and a different offer to the proposed strategic sites AB2 and KL15 which can bring a variety of opportunities to existing and future employers in the area.

#### DELIVERABILITY OF TALKE PARK (REF: TK30)

The Strategic Employment Sites Assessment – 2024 Update (June 2024) (herein 'SESA 2024'), prepared by Aspinall Verdi, concludes that there are "considerable issues to overcome" associated with the delivery of Talke Park, and "there will be a long lead in period before any development takes place", suggesting this renders an allocation premature. We consider the perceived "issues" would not prevent development or cause a significant delay. Whilst the site is not an immediate short-term opportunity in the Local Plan, it can be delivered in the plan period. Our response to the comments made are set out in Table 1, which should be read alongside the Vision Document and the supporting technical reports (Geo-environmental Desk Study; Highways Access Appraisal; Heritage Briefing Note; Note on Socio-economic Benefits; and Ecology and Landscaping Combined Technical Note). These were prepared in support of the submission to the previous First Draft Local Plan consultation and, whilst some changes have been made to the Indicative Proposed Masterplan since that submission, the assessments are still applicable and accurate. Note that the masterplan has been underpinned by significant technical work such as an earthworks cut and fill model to demonstrate that the site is deliverable and this indicative layout could be achieved. This establishes that the site can provide up to 390 new homes, and 95,500sqm (1m sqft) of employment floorspace (see attachment, table 1, Response to commentary in the Strategic Employment Sites Assessment – 2024 Update)

#### GREEN BELT

The main current constraint to the development of Talke Park is its location within the Green Belt. The preparation of a new Local Plan for Newcastle-under-Lyme presents an opportunity for this to be reviewed and the LPA has demonstrated exceptional circumstances to justify the release of land from the Green Belt in order to meet its development needs over the plan period.

Our previous representations submitted to the Draft Local Plan were supported by an Ecology and Landscaping Combined Technical Note, which set out the high-level baseline and opportunities and constraints to development within the Site.

The council has now published a Green Belt Assessment Part 4 (July 2024) which specifically assesses Talke Park (TK30), finding that it's development would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town. Whilst it finds that it would represent an incursion into undeveloped countryside, this would be the case for any greenfield site. The Assessment concludes that Talke Park (TK30) did not make a greater

contribution to the purposes of the Green Belt than AB2 which is proposed for allocation; indeed TK30 is recommended to be taken forward for consideration, whilst AB2 is not. Its current Green Belt status cannot therefore be a reason for the non-allocation of Talke Park.

The letter from Tyler Grange dated 26 September 2024 provides a number of indicative visuals which demonstrate that development within the site will not obstruct views to and from the Wedgwood Monument, and that the Monument would continue to be seen as a distinct element on high ground separate from and raised above the development. The illustrative mitigation strategy in Appendix 1 demonstrates where opportunities existing to create visual and physical enclosure through the use of green infrastructure. This, together with careful use of cladding tones and designs will further reduce the visual impact of the proposed buildings in views to and from the monument.

In addition to the land at Chatterley Valley and Talke Park, Harworth is in control of additional land in the authority, namely land to the north of Peacock Hay Road (north of Chatterley Valley). A plan is provided at Appendix A (taken from a previous SHLAA assessment). This land, extending to 6.65ha and would be available to offer Biodiversity Offset and any Green Belt compensation land required in association with the allocation of land at Talke Park.

#### SITE DELIVERY TIMEFRAMES

The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi considers that Talke Park “has the potential be a high-quality site for local employment in a future local plan”, thereby indicating that if the potential issues associated with the site’s delivery can be overcome (as the above table demonstrates is the case), it is the lead-in time until development proceeds which would render the site unsuitable for allocation. However, Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer (as considered below). The anticipated programme for delivery and rationale is set out below:

The key constraint to the development of the site, at this time, is its Green Belt designation. An application would not be progressed until the site were to be released from the Green Belt. Should this be proposed prior to the submission of the Local Plan for Examination, the following timeframe may be brought forward as pre-application discussions and surveys could be progressed with greater comfort that the allocation is likely to be brought forward;

Whilst the Local Development Scheme targets the adoption of the Local Plan in 2025 Q5, we anticipate that a more realistic target would be 2026 Q4. If this is the case, then an application could be progressed with the necessary surveys/ assessments and consultation, to lead to the submission of an outline or hybrid planning application by the end of 2027. Note the hybrid application approach was taken at Chatterley Valley to ensure full planning permission was secured for the earthworks, allowing them to get underway sooner. The application could be determined in 2028 Q2/ Q3;

Earthworks could then proceed with the submission of reserved matters application/s for the first phase/s in 2028 Q3/4. The application could be determined in 2029 Q2/ Q3;

The first units could then be constructed and available before the end of 2029. We would expect this to include the first homes;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 5-6 years for the employment units, which may run from 2029 to 2035. This would form a logical continuation of the anticipated construction and occupation programme at Chatterley Park, whereby it is envisaged this will be constructed and fully occupied by 2030;

Harworth and Graham Ward Farms Limited expect a delivery programme of circa 8 years for the homes, on the basis of 50 being delivered per year, which may run from 2029 to 2037;

Harworth and Graham Ward Farms Limited are confident that the site can be delivered within the Local Plan period, whether this be up to 2040, or indeed longer (as considered below).

In summary, Harworth and Graham Ward Farms Limited do not consider that the design, planning, earthworks and construction programme for the site will not prevent it from being delivered in the Local Plan period. Indeed, we do not anticipate that this would be significantly different to the delivery of proposed strategic site AB2 given its location, so the availability of employment space will be limited, warranting the allocation of Talke Park.

#### BENEFITS

The allocation of Talke Park would:

Provide up to 390 new homes, housing needs/ growth;

Provide 95,500sqm (1m sqft)/ circa 21ha of employment floorspace, emp needs/ growth, providing up to 1,000 jobs in the construction phase and circa 3,600 permanent jobs once operational, of which around 1,000 would be taken by residents of Newcastle-Under-Lyme;

Meet local need for school places;

The Gross Value Added to the economy is estimated to be circa £15.3 million per year during the construction phase and £140 million per year during operation. It is also anticipated around £1.9 million per year in revenue would be generated through Council Tax and Business Rates receipts;

The location of Talke Park directly adjacent to the existing settlement limits offers clear benefits in terms of easy access to jobs, new homes, sustainable travel and green spaces. This local area would directly benefit from local expenditure of around £85,000 per year from the construction workforce over the construction phase, and around £5.3 million per year from the new residents;

Talke Park will promote sustainable communities, supporting improvements, connections and relationship with the wider area such as Wedgwood Monument;

Harworth and Graham Ward Farms Limited envisage the development to of high quality design and sustainability standards providing market leading approaches to ESG and Carbon Reduction, incorporating Net Zero design criteria and contributing to the delivery of Harworth's Net Zero Carbon Pathway2. This means that all commercial buildings Talke Park will be:

—Net Zero Carbon in operation (subject to occupier process requirements);

—Net Zero Carbon in construction and operation for any units build after 2030; and

—BREEAM Excellent.

#### DURATION OF THE LOCAL PLAN PERIOD

The NPPF states, at paragraph 22, that strategic policies should look ahead over a minimum 15 year period from adoption, in order to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. It adds that, where larger scale



developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area (as is the case here where two strategic sites are currently proposed for allocation), policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

The Local Plan the Plan seeks to cover the plan period 2020 – 2040. This approach would therefore only meet the minimum timeframe as required by the NPPF if adopted before the end of 2025. This is a short timeframe allowing for the review and potential update of the Local Plan prior to submission and matters arising during examination. The Local Plan is therefore at significant risk of not being consistent with national policy.

The Local Plan should therefore cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

#### CHANGES SOUGHT TO THE LOCAL PLAN

Harworth and Graham Ward Farms Limited seeks the allocation of TK30 as a Strategic Site, including the following:

Policy PSD1 – the inclusion of the site under point 3 as a strategic site “Land off Talke Roundabout / A500 to offer a sustainable urban extension providing a strategic employment location, new homes, and public space”.

Policy PSD5 – the site should be listed for removal from the Green Belt.

Update to Policy PSD3 – the figures in terms of housing and employment provision should be updated to account for the allocation of TK30.

Addition of a new Policy TK30 relating to the site's development. A suggested policy is provided below, which we would be happy to discuss further.

Policy TK30 ‘Land off Talke Roundabout / A500’

Land off Talke Roundabout / A500 is allocated as a sustainable urban extension providing employment land, new homes and public space. The site extends to circa 66 hectares and is allocated for uses including circa 390 new homes and 21 hectares (circa 95,500 sqm of floorspace) of employment land. Where ancillary non-employment uses are proposed, these will primarily support the onsite businesses and industrial processes. Development will be permitted subject to:

- 1.Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2.Safe and convenient access into the development via a new access on Talke Road for the employment development and provision of two access points on Deans Lane for the residential development,
- 3.In line with Policy SA1 (General Requirements), a masterplan and design code should be prepared and agreed for the site which will:

a.Consider sustainable travel links including cycle and pedestrian connectivity including to public transport links. Development should also consider walking and active travel for health and wellbeing purposes within the site,

b.provide for appropriate boundary treatments to the existing Green Belt,

c.Facilitate improvements to local footpaths and linkages to Wedgwood Monument

d.Achieve high quality design reflecting the landscape location of the site and creating a vibrant destination and attractive public realm. This should recognise the transitional location between the higher density urban and rural area,

e.Ensure the layout and development of the site is landscape led and buildings or structures are designed to ensure they are not intrusive in significant views from the surrounding area including the Wedgwood Monument.

4.Submission of a coal mining risk assessment, land contamination assessment and mitigation strategy,

5.Submission of a drainage strategy,

6.Appropriate measures to control impact of increased traffic movement or uses within the site on local amenity including noise and air quality on the surrounding area. This should include submission of a noise and air quality assessment and mitigation strategy,

7.Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the setting of Wedgwood Monument,

8.Financial contributions to improvements in the capacity of local schools and health facilities.

9.Provision of a new and / or enhanced bus service from Newcastle-under-Lyme to the site.

10.Employment units to achieve at least BREEAM excellent standard with an aim for the most recent BREEAM outstanding standard,

11.Retention and enhancement of mature trees and existing hedgerows on the site and its boundaries, with minimal breaks in hedgerows to facilitate vehicular traffic. Strengthened boundaries to the site, comprising landscape buffers, and the creation of new strong, defensible boundaries to the Green Belt, 12.The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement.

We also consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. This will require additional land to be allocated for employment and residential use. The allocation of Talke Park would assist in addressing this subsequent shortfall.

#### CONCLUSION

We consider that, in its current form, the Final Draft Local Plan is not sound, on the basis that it is (1) not positively prepared, (2) not justified, and (3) not consistent with national policy. We consider that the allocation of ‘Land off Talke Roundabout / A500’ (herein ‘Talke Park’) would resolve this soundness matter. Harworth and Graham Ward Farms Limited are in control of the site and would therefore lead its design and delivery, as per Chatterley Park. Exceptional circumstances have been demonstrated to justify the release of land from the Green Belt. Allocating Talke Park would meet the Council's growth aspirations in terms of delivering sustainable new homes and jobs, meeting local needs and providing more economic opportunities for residents of Newcastle-under-Lyme. Harworth is an experienced land and property regeneration company which is currently investing in Newcastle under Lyme at the nearby Chatterley Valley site. The above commentary demonstrates why the site is suitable and available for allocation, notably:



	<p>The Council's own evidence base supports the allocation of the site. The Strategic Employment Sites Assessment – 2024 Update (June 2024), prepared by Aspinall Verdi notes that it “has the potential be a high-quality site for local employment [albeit] in a future local plan”. There is therefore recognition that the perceived issues associated with the site's delivery can be overcome, but the Council are uncertain on programme.</p> <p>The SWECO report which forms part of the evidence base notes that the Talke Site has the best walking accessibility score of the three potential strategic sites. That SWECO report, and Mosodi's independent assessment of the site, confirm that there are no highways or accessibility constraints to prevent the site being allocated.</p> <p>The council's Green Belt Assessment Part 4 (July 2024) concludes that the development of Talke Park would not constitute unrestricted sprawl, would not result in neighbouring towns merging; and would not impact upon the setting or character of the historic town.</p> <p>Harworth and Graham Ward Farms Limited are confident that the site can be delivered in the Local Plan period, whether this be up to 2040, or indeed longer.</p>
<b>Q7 Modification</b>	We consider that the period which the Local Plan covers should be extended beyond 2040, and cover up to 2042 as a minimum and ideally to 2045. We consider that the allocation of site ref: TK30 (the Land off Talke Roundabout / A500), as a strategic location, for housing and employment would resolve the soundness matters outlined at 6 above. Further detail is provided in the supporting covering letter.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In order to accurately outline our client's position and aid the Inspector in providing any further information relating to site TK30, on the basis we consider the allocation of the site would resolve our concerns about the Local Plan being unsound.
<b>Attachments</b>	<a href="#">1300486 Harworth APP 1 Vision Docs.pdf</a> <a href="#">1300486 Harworth APP2 Technical documents.pdf</a> <a href="#">1300486 Harworth Talke Cover Letter.pdf</a>

<b>Comment ID</b>	NULLP967
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Given Name</b>	Keepmoat Homes
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Walker
<b>Agent Given Name</b>	Kerry
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representation. Keepmoat object to the settlement boundary of Madeley as proposed, as it does not identify sufficient sites to be able to accommodate the 250 dwellings identified.</p> <p>As it stands, the settlement is proposed to be altered only to accommodate the single allocation – that being site MD29, capable of accommodating around 150 dwellings. There are no other alterations proposed.</p> <p>Looking at the housing trajectory in Appendix 6, this does not really provide much additional assistance to clarify the supply of sites. It is also noted that the latest Housing Development Monitoring Report is dated 20101, so this does not assist and the latest Annual Monitoring Report2 is for the 21/22 period and this also does not include any additional relevant data. As such it is difficult to understand what has possibly been delivered in Madeley between 2020 and the submission of the Plan to assist in understanding what the residual requirement is.</p> <p>In terms of current live planning applications, the latest 5 year housing land supply assessment3 covers the period 2023-2028. This provides some assistance in identifying the existing supply of sites in this area. After reviewing Appendix 1 of the assessment, this identifies the following sites exceeding 5 dwellings( see attachment)</p> <p>In addition to the above, the planning permission at land south of Honeywall Lane (Ref: 21/00593/RM and 17/00514/OUT) was not implemented at the time the Council's 2023 5 Yr HLS was issued, there is no evidence of the relevant pre-commencement conditions being submitted and approved, other than the WSI and the planning permission expired on 11/01/2024.</p> <p>Pegasus have only identified those sites exceeding 5 dwelling, to ensure that there is some flexibility in the supply of sites, given it is inevitable that there will be some lapse rates in consented sites being delivered and para 5.12 confirms the figures are a guide and not a ceiling.</p> <p>Therefore, and as part of the Examination process, it is requested that the Council provide a full list of housing sites and allocations to corroborate the chart in Appendix 6. Pegasus would also note that the chart only seems to identify the delivery of sites over a 17-year period, despite the full plan period being 2020-2040, so this also needs clarifying. Until this evidence is prepared, Pegasus reserve the right to make further comments on the supply of homes in this area.</p> <p>After taking into consideration the known consented and under construction sites and the single allocation the residual requirement of additional homes in Madeley (and Betley) to seek to achieve the 250 dwellings, is somewhere in the region of 50 dwellings.</p> <p>In order for the Plan to be positively prepared, additional site(s) should be identified in Madeley. This would allow for some flexibility in the supply of sites and also to achieve the minimum housing requirements set out in Policy PSD1.</p>
<b>Q7 Modification</b>	Please see attached representation
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representation
<b>Attachments</b>	<a href="#">1364299 Keepmoat Homes.pdf</a>
<b>Comment ID</b>	NULLP965
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Given Name</b>	Keepmoat Homes
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Walker
<b>Agent Given Name</b>	Kerry
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representation. Keepmoat do not have any particular comments on the overall strategy, apart from supporting the acknowledgement of the role rural centres play in meeting the day to day needs of local residents and this will be supported by meeting some of the development needs of the Borough, commensurate to their role as villages.</p> <p>The evidence base for the settlement hierarchy, certainly the rural centres, is the Rural Topic Paper. Within this, there is an assessment of the range of facilities, focusing on core facilities to assist in categorising rural settlements. In this regards Madeley performs well and scores green for all areas of the assessment. This shows it is therefore a sustainable rural settlement capable of accommodating additional development and supporting the nearby Madeley Heath. Accordingly, Keepmoat fully support Madeley as a defined Rural Centre</p>
<b>Q7 Modification</b>	Please see attached representation
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representation
<b>Attachments</b>	<a href="#">1364299 Keepmoat Homes.pdf</a>
<b>Comment ID</b>	NULLP966
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Given Name</b>	Keepmoat Homes
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Walker
<b>Agent Given Name</b>	Kerry
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representation. The proposed distribution of development is noted within Policy PSD3. The distribution of development is clear, but there is a concern around the level of flexibility within the distribution. As presented the distribution totals the 8,000 homes as identified in PSD1. Para 5.12 of the Draft Plan is clear in so far as it confirms that: The figures presented in this policy are intended as a guide and are neither a ceiling nor a specific target. Commitments and completions since the start of the Plan period will contribute towards the indicative targets outlined above and to maintain an available supply of housing land. The broad level of development proposed for our settlements will be delivered through a combination of Local Plan site allocations and through existing housing land supply. (Pegasus emphasis)</p> <p>There needs to be a reasonable level of flexibility in this distribution in order for the Plan to be positively prepared and to take into consideration elements such as lapse rates for sites with planning approvals at the point of adoption.</p> <p>In addition to this, proposed allocated sites also need to be masterplanned in accordance with Policy SA1. This expects the delivery of various different policy requirements, as well as delivering biodiversity net gain as required by the Environment Act and also Policy SE7. Until this process is undertaken, it is not clear how the development quantum at some sites have been arrived at, especially as some densities expected in HOU2 vary considerably.</p> <p>Following on from this overarching point on the distribution of development, Keepmoat would just question why Madeley and Madeley Heath, along with Betley and Wrinehill have been considered together? Betley and Wrinehill are located to the north and are separated somewhat from Madeley. In addition, Betley and Wrinehill are also constrained by Green Belt, so development options are severely limited, largely to sites within the settlement boundary.</p> <p>Across these settlements, it is only the western edge of Madeley, mostly beyond the railway line, which is free from Green Belt constraints. The only site to the east of the railway line, but outside of the proposed settlement boundary and not constrained by Green Belt is Keepmoat's. Nearby is where the single allocation for Madeley is located, so it must be considered an appropriate location for housing, certainly as none of the supporting report submitted with the application identify any evidence to the contrary. It is reasonable for Madeley and Madeley Heath to be considered together given the proximity of these settlements. As such, all development should be directed to Madeley and Madeley Heath. Accordingly, Keepmoat would have no particular concerns with Plan in identifying sufficient sites to be able to deliver the minimum 250 dwellings across the plan period in Madeley.</p> <p>In addition, and in order to be positively prepared and in accordance with Para 35 of the NPPF, it needs to be remembered that all housing figures to be distributed to the various settlements should be presented as a minimum figure. In this respect, it is noted in Table 2 (pg 14) that the figures presented in the Plan are minimum housing requirements</p>

<b>Q7 Modification</b>	Please see attached representation
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representation
<b>Attachments</b>	<a href="#">1364299 Keepmoat Homes.pdf</a>
<b>Comment ID</b>	NULLP964
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Given Name</b>	Keepmoat Homes
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Walker
<b>Agent Given Name</b>	Kerry
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representation. This policy outlines that a minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 400 dwellings per annum. In terms of context for this figure, it is based on an employment growth forecast in the HEDNA Update 2024. It does not however reflect the existing SM figure of (330dpa).</p> <p>Keepmoat support the approach of Newcastle under Lyme in progressing a Plan a plan which exceeds current SM housing targets to submission and examination in order to ensure that the Borough can have a positively prepared and up-to-date plan in place as soon as reasonably possible.</p>
<b>Q7 Modification</b>	Please see attached representation
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representation
<b>Attachments</b>	<a href="#">1364299 Keepmoat Homes.pdf</a>
<b>Comment ID</b>	NULLP968
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Given Name</b>	Keepmoat Homes
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Walker
<b>Agent Given Name</b>	Kerry
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representation. Keepmoat's Land Interest</p> <p>Keepmoat's site is on the western side of Moss Lane, just outside the village envelope of Madeley; however, it is well related to the village centre. Vehicular access is currently provided from both the garden of Rowley House and a gated access with Moss Lane.</p> <p>The site comprises of approximately 1.65ha of land bounded by the rear gardens of the residential properties of The Bridge Path along the north east. There is unmanaged vegetation defining the north west boundary, as well as the south west boundary along Bower End Lane. Moss Cottage and Rowley House sit directly to the east, as shown on the site location plan below (see attachment)</p> <p>The site is currently subject to a full a planning application (Ref: 24/00619/FUL) seeking planning permission for the construction of 37 dwellings along with associated access, open space, drainage basin and pumping station. The current layout plan for the application is enclosed at Appendix 1.</p> <p>The application was validated in September 2024 and in that time some progress has been made, although a number of consultee responses remain outstanding at the time of writing this representation.</p> <p>Conclusion</p>

	<p>Pegasus Group have prepared this representation to the Newcastle under Lyme Draft Local Plan (Regulation 19) Consultation, which ran until 7 October 2024 on behalf of Keepmoat. Keepmoat welcome the production of the Newcastle under Lyme Draft Local Plan and are keen to work with the Council to adopt a sound Plan.</p> <p>In order for the Plan to be positively prepared, additional site(s) should be identified in Madeley. Initial calculations based on the evidence supporting the plan and the single allocation is that site(s) need to be identified to deliver in the order of 50 dwellings. This would allow for some flexibility in the supply of sites and also to achieve the minimum housing requirements set out in Policy PSD1.</p> <p>Keepmoat trust that the Council will find these comments useful as it continues to progress its Local Plan towards submission and Examination.</p>
<b>Q7 Modification</b>	Please see attached representation
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representation
<b>Attachments</b>	<a href="#">1364299 Keepmoat Homes.pdf</a>



<b>Comment ID</b>	NULLP998
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Given Name</b>	Lone Star Land Ltd
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p><b>Policy PSD1 – Overall Development Strategy</b></p> <p>This policy outlines that a minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 400 dwellings per annum.</p> <p>In terms of context for this figure, it is based on an employment growth forecast in the HEDNA Update 2024. It does not however reflect the existing SM figure of (330dpa).</p> <p>To support the Council in progressing with the Local Plan as drafted, Counsel has advised that the draft Plan falls squarely within exception 226(a) of the Draft NPPF and therefore the provisions provide imperative advice, namely that the Plan “will” be examined, in this case, under the provisions of the currently extant NPPF (Appendix 1)</p> <p>Accordingly Lone Star support the approach of Newcastle under Lyme in progressing a Plan to submission and examination in order to ensure that the Borough can have an up-to-date plan in place as soon as reasonably possible.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1002
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Given Name</b>	Lone Star Land Ltd
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p><b>Policy PSD2 – Settlement Hierarchy</b></p> <p>2.6. Lone Star do not have any particular comments on the overall strategy, apart from supporting the acknowledgement of the role of rural centres play in meeting the day to day needs of local residents and this will be supported by meeting some of the development needs of the Borough, commensurate to their role as villages.</p> <p>2.7. The evidence base for the settlement hierarchy, certainly the rural centres, is the Rural Topic Paper. Within this there is an assessment of the range of facilities, focusing on core facilities to assist in categorising rural settlement. In this regards Madeley performs well and scores green for all areas of the assessment. This shows it is therefore a sustainable rural settlement.</p> <p>2.8. Accordingly Lone Star fully support Madeley as a defined Rural Centre.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1006
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Given Name</b>	Lone Star Land Ltd
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4

<b>Q6 Details</b>	<b>Policy PSD4 – Development Boundaries and the Open Countryside</b> 2.14. Lone Star support the alterations to the settlement boundary of Madeley to accommodate the proposed site allocation MD29.
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1004
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Given Name</b>	Lone Star Land Ltd
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p><b>Policy PSD3 – Distribution of Development</b></p> <p>The proposed distribution of development is noted within Policy PSD3. Lone Star would just question why Madeley and Madeley Heath, along with Betley and Wrinehill been considered together? Betley and Wrinehill are located to the north and are separated somewhat from Madeley. In addition, Betley and Wrinehill are also constrained by Green Belt.</p> <p>It is only the western edge of Madeley which is free from Green Belt constraints, and this is where the single allocation (which we address further below) is proposed for residential development to address the identified needs in this location.</p> <p>It is reasonable for Madeley and Madeley Heath to be considered together given the proximity of those settlements. As such, all development should be directed to Madeley and Madeley Heath. Accordingly, Lone Star would have no particular concerns with directing 250 dwellings across the plan period being directed to Madeley.</p> <p>In addition, and in order to be positively prepared and in accordance with Para 35 of the NPPF, all housing figures to be distributed to the various settlements should be presented as a minimum figure. In this respect, it is noted in Table 2 (pg 14) that the figures presented in the Plan are minimum housing requirements.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>
<b>Comment ID</b>	NULLP1008
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Given Name</b>	Lone Star Land Ltd
<b>Agent Company / Organisation</b>	Pegasus Group
<b>Agent Family Name</b>	Robinson
<b>Agent Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29

## Q6 Details

### Land North of Bar Hill, Madeley (Allocation MD29)

2.15. Just to start with, Paragraph 13.141 and its title should be amended slightly to reference Madeley and Madeley Heath as the rural centre, not Madeley and Betley, as set out above.

2.16. In relation to the wider settlement, Madeley was considered as part of the Rural Topic Paper which has informed the settlement hierarchy. Within this there is an assessment of the range of facilities, focusing on core facilities to assist in categorising rural settlement. In this regard, Madeley performs well and scores green for all areas of the assessment, which demonstrated that Madeley is a sustainable rural settlement capable of accommodating additional development.

#### Response to Site Specific Requirements

2.17. The site has been identified as a draft housing allocation in the Regulation 19 Local Plan under site MD29 which is clearly illustrated as a preferred location for residential development on the supporting Proposal Map. It would also be useful to make reference in the opening to this Policy to the outline planning application submitted at the site, as this is likely to be approved at the point of the adoption of the Plan.

2.18. Lone Star would also comment on the site being identified for '150 dwellings'. In order to comply with the outline application and for the plan to be positively prepared (in accordance with Paragraph 16 of the NPPF), and to make the optimum use of land (as required by various paragraphs in the NPPF including 8, 11, 119, 124 and 125), the quantum of development for this allocation should be changed to 'at least 155 dwellings'. This is also relevant for para 13.143, to ensure consistency.

2.19. In relation to point 1 there is no need for a masterplan to be prepared in accordance with Policy SA1. A masterplan has been prepared and submitted in support of the planning application on the site (Appendix 2). This is the masterplan that should be referenced in this policy, given it has been subject to consultation with the Council and there are no consultee responses that cannot or have not been addressed.

2.20. Active travel links are suggested in point 3, with an expectation of enhancements to the footbridge over the west coast mainline. It is recommended that the policy is specific and requires the footbridge to be improved in general accordance with the details agreed as part of the planning application, as shown on Plan Ref: SCP/210296/D10 (Appendix 3).

2.21. Elements 4 (landscape led), 5 (long range views) and 11 (heritage) are also less relevant given the masterplan proposed at point 1. It should also be noted that the masterplan was subject to a Design Panel review before the application was submitted. This covered detailed elements which the masterplan should consider at the application stage, including reflecting local architectural styles and also reflecting topographical features such as landmarks and long views, which it has done.

2.22. If there is a need for any direction on these specific elements, then reference could be made to the submitted DAS or the LVIA and the Heritage Assessment in the absence of a planning approval on the site at the point of the adoption of the Local Plan

2.23. In relation to para 13.150, the element relating to the sequential approach to flood risk needs removing. As part of its allocation, the Council should have assessed flood risk on the site and determined it is sequentially preferable than other options in Madeley. When this site is allocated, it is not for a planning application to revisit this. Furthermore, the planning application is supported by a site-specific flood risk assessment, and we understand that shortly it will be confirmed by Network Rail and the LLFA that there are no flood risk issues in respect of this site.

2.24. The final point Lone Star would want to make is in respect of the Neighbourhood Plan. As drafted the Neighbourhood Plan would be in conformity with the strategic policies currently adopted Local Plan (NPPF footnote 16). It is not for this emerging Plan to be guided by existing Neighbourhood Plans and as set out in Para 30 of the NPPF, "Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently".

2.25. In order to assist the Council, we have suggested a track change version of the Policy MD29 below:

Land north of Bar Hill is allocated for residential development for 150 at least 155 dwellings. Development will be permitted to reflect outline planning application Ref: 23/00979/OUT and ~~will be permitted~~ subject to:

~~- 1. Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements);~~ Be developed in broad compliance with the masterplan ref: 645868/Rev22D

2. Access to the development being taken via Bar Hill,

3. Improvements to active travel links, including enhancement to the ~~width and condition of~~ the existing footbridge over the rail line as set out in SCP Plan SCP/210296/D10,

4. The layout and development of the site will be in accordance with masterplan referenced at point 1 and the LVIA and DAS submitted in support of the application on the site ~~landscape led and buildings or structures designed to ensure they are not intrusive in~~ significant views from the surrounding area, including the area of open countryside on its western edge. ~~Where possible existing hedgerows and trees should be retained on the site;~~ particularly to the tree-lined driveway used to access the existing property at Moor Hall Farm;

~~5. Development within the site should preserve long range views to the west;~~

6. Any proposal should provide drainage details for surface water on the site,

7. Proximity of Bar Hill Wood Ancient Woodland in near proximity (500m) to the west of the site being recognised, & any impacts, mitigated,

8. Recognition of Tree Preservation Orders (TPO), including root networks,

	<p>9. <del>Submission of a noise assessment and</del> Reflect the mitigation strategy set out in the noise report prepared by InAcoustic (Ref:23-383) in relation to the impact of the A525 and West Coast Mainline railway line,</p> <p>10. Preservation and enhancement of the existing Public Right of Way adjoining the site's western boundary,</p> <p>11. <del>Submission of a Heritage Impact Assessment to Demonstrate</del> how the layout and design of the development will respond sensitively to the significance of nearby heritage assets giving consideration to the HIA for the site prepared by the Council and the Heritage Assessment prepared in support of the application.</p> <p>12. Financial contributions to improvements in the capacity of local schools and health facilities</p> <p>2.26. Overall, Lone Star fully support the proposed allocation of site MD29, but there are slight alterations required, as set out above, to ensure that the allocation is positively prepared, to ensure it reflects the outline planning application on the site and is not subject to additional onerous requirements.</p>
<b>Q10 File 1</b>	6390526
<b>Attachments</b>	<a href="#">1364226 Phil Robinson.pdf</a>

<b>Comment ID</b>	NULLP1011
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Gavin
<b>Agent Given Name</b>	Alexandra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	In line with their representations made at the Regulation 18 stage, McCarthy Stone wish to reaffirm their support of the Draft Local Plan. At the outset, McCarthy Stone are supportive of the principle of draft Policy PSD1 (Overall Development Strategy), which plans for a minimum of 8,000 dwellings to be delivered in the Borough over the Plan period. Furthermore, McCarthy Stone welcomes part 3 of draft Policy PSD1, which states that the Council will make sufficient provision for housing by supporting the development of sites allocated in the Local Plan.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q10 File 1</b>	6390531
<b>Attachments</b>	<a href="#">1341949 Alexandra Gavin.pdf</a>
<b>Comment ID</b>	NULLP1015
<b>Order</b>	236
<b>Title</b>	Policy TC7 Land bound by Ryecroft, Ryebank , Merrial Street, Corporation Street and Liverpool Road, Newcastle
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Gavin
<b>Agent Given Name</b>	Alexandra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7
<b>Q6 Details</b>	As set out in their representation to the Regulation 18 consultation, McCarthy Stone is supportive of the proposed Strategic Centre (Town) allocation TC7 (Land bound by Ryecroft, Ryebank, Merrial Street, Corporation Street and Liverpool Road, Newcastle). The policy wording could be expanded upon to promote a mix of housing to address the needs of the Borough, in particular, the needs of older people. Whilst McCarthy Stone accept that financial contributions will be required to improve infrastructure to serve the development, this should be proportionate to the scale and type of development proposed, and be subject to viability.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q10 File 1</b>	6390531
<b>Attachments</b>	<a href="#">1341949 Alexandra Gavin.pdf</a>
<b>Comment ID</b>	NULLP1036
<b>Order</b>	50
<b>Title</b>	Policy HOU5: Specialist Needs Housing
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	THE PLANNING BUREAU
<b>Agent Position</b>	Planning Associate
<b>Agent Family Name</b>	Vlach
<b>Agent Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q6 Details</b>	Please see attached representations. Whilst we are pleased to see a separate policy for specialist needs housing that includes for older people and are generally supportive, we make the following comments: 1. point c, requires specialist housing for older people to meet the accessibility and wheelchair standards set out in Policy HOU3. However, we noted in our response to HOU3 that In relation to specialist



	<p>housing for older people the policy requires 10% of market dwellings to meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard. Although, this requirement initially appears to be tested within the Viability Study, however on closer inspection this appears to be at a cost of £0. As stated in our response to HOU1 the viability study's findings are that older persons' housing is unviable in all scenarios and that M4 (3) housing has a large additional cost. Therefore, evidence has not been provided to show that compliance with 10% M4(3)A is viable given that all older persons' housing schemes tested have been shown to not be viable. This requirement is therefore contrary to government advice contained in PPG Older and Disabled People (Paragraph: 009 Reference ID: 63-009-20190626 ) which states that planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.</p> <p>2.in the Supporting Information to the policy Paragraph 7.38 includes a table from the HENA (2024) specifying the number of units needed for sheltered, enhanced sheltered and extra care retirement housing over the plan period. However, the HENA report states in paragraph 5.34 that it has not reconsidered the needs of specific groups in detail, rather the figures set out are only indicative estimates based on past trends. As such, it recognises that it is possible that more such specialist housing could be needed if it becomes favoured by more older people in the future'.</p> <p>Recommendation</p> <p>In order for policy Hou5 to be justified the following amendments should be made:</p> <ul style="list-style-type: none"> <li>•Paragraph 7.38 should state clearly that the figures included in Table 4 are 'indicative estimates' based on past trends, as per the HENA (2024)</li> <li>•Point c of the policy should be deleted.</li> </ul>
<b>Q7 Modification</b>	<p>Please see attached representations.</p> <p>In order for policy Hou5 to be justified the following amendments should be made:</p> <ul style="list-style-type: none"> <li>•Paragraph 7.38 should state clearly that the figures included in Table 4 are 'indicative estimates' based on past trends, as per the HENA (2024)</li> <li>•Point c of the policy should be deleted.</li> </ul>
<b>Attachments</b>	<a href="#">1341950 McCarthy Stone.pdf</a>
<b>Comment ID</b>	NULLP1013
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Gavin
<b>Agent Given Name</b>	Alexandra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	It is noted that draft Policy HOU2 (Housing Mix and Density) specifically refers to the requirement for major development to make provision for specific housing needs, including older people. This reflects the findings that are set out within the Newcastle- under-Lyme Housing and Economic Needs Assessment (April 2024), indicating that the number of residents in the Borough aged 65 or above is projected to increase by 22% over the Plan period. This policy could be progressed further to explicitly support older persons' housing in sustainable locations.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q10 File 1</b>	6390531
<b>Attachments</b>	<a href="#">1341949 Alexandra Gavin.pdf</a>
<b>Comment ID</b>	NULLP1014
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Gavin
<b>Agent Given Name</b>	Alexandra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q6 Details</b>	McCarthy Stone acknowledge that draft Policy SA1 (General Requirements) sets out the strategic considerations for the proposed allocations. This includes the requirement for masterplans to be prepared

	<p>by applicants and agreed with the Council to deliver high quality, sustainable and policy compliant developments. McCarthy Stone agree that sites allocated for development, especially those earmarked for a mix of uses, should come forward in a way that ensures their comprehensive delivery. Notwithstanding this, it is important for the Council to recognise that development parcels may need to be delivered independently of one another and therefore a degree of flexibility should be applied when determining relevant planning applications, by taking into account the need for a masterplan to evolve where necessary. It is important that the Council does not inadvertently preclude the delivery of earlier development on some parcels by imposing a requirement for a comprehensive masterplan to be approved (and therefore fixed) in order to determine any such planning application. A more pragmatic and market-facing approach would be to allow development to come forward that can demonstrate general conformance with a comprehensive masterplan for an allocated site, such that it would not prejudice the delivery of subsequent parcels. It is currently unclear if planning applications would be approved if a site-wide masterplan has not been agreed with the Council.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q10 File 1</b>	6390531
<b>Attachments</b>	<a href="#">1341949 Alexandra Gavin.pdf</a>
<b>Comment ID</b>	NULLP1012
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Gavin
<b>Agent Given Name</b>	Alexandra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>McCarthy Stone is supportive of draft Policy PSD2, which identifies the town of Newcastle-under-Lyme as the key strategic centre of the Borough, containing the largest range of economic and residential areas. Furthermore, the wording of draft Policy PSD3, which expects the strategic centre of Newcastle-under-Lyme to accommodate in the order 5,200 new homes, is supported by McCarthy Stone to align with planned regeneration initiatives within the town centre.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q10 File 1</b>	6390531
<b>Attachments</b>	<a href="#">1341949 Alexandra Gavin.pdf</a>
<b>Comment ID</b>	NULLP1034
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	THE PLANNING BUREAU
<b>Agent Position</b>	Planning Associate
<b>Agent Family Name</b>	Vlach
<b>Agent Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>Please refer to attached representations.</p> <p>Policy HOU 1 affordable Housing</p> <p>Item 1 of the policy states:</p> <p>On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:</p> <ul style="list-style-type: none"> <li>a. 30% of all units on greenfield sites.</li> <li>b. 15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.</li> <li>c. 25% of units on brownfield sites within the 'high value zone' as shown on the policies map.</li> </ul> <p>The Supporting Information to the policy at Paragraph 7.9 confirms that 'proposals for extra care accommodation, assisted living or other forms of retirement housing to be let and sold on the open market will be subject to the requirements of this policy to provide affordable housing'</p> <p>Applying this policy to retirement housing is not justified or consistent with national policy considering that the 'Newcastle-under-Lyme Local Plan viability Study' by Porter Planning Economics July 2024 which underpins the Local Plan concludes that 'The viability results for the tested older persons accommodation by accommodation type, value area and land type all show a negative residual land value, as set out in Tables 8.3 and 8.4 on page 75 of the viability study'.</p>

Paragraph 8.11 of the Viability Study continues...It is clear from these results that the older person accommodation would be unlikely to come forward under the emerging Local Plan and current residential market. The testing shows that even by varying the affordable rate, the current residential market is unable to afford to deliver any affordable housing based on standard market conditions in the older persons accommodation sector'.

The PPG on viability, Paragraph: 001 Reference ID: 10-001-20190509 confirms that 'policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.'

If Policy Hou1 is applied to specialist housing for older people, the Council's own commissioned evidence states that it would serve to inhibit such housing coming forward. Yet despite this conclusion the Viability Study recommends that 'the 10% of dwellings to be for affordable home ownership should also be applied to older person homes'. (para 9.8).

The current policy, as worded, would require any proposal for specialist housing for older people to delivery policy compliant affordable housing or to provide a viability assessment if policy compliant on-site affordable housing was not achievable. This is in conflict with the PPG on viability at Paragraph: 002 Reference ID: 10-002-20190509 which confirms that 'The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan' and that 'Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage'.

In view of the conclusions of the viability study, the requirement for older persons housing to provide affordable housing should be removed from the policy as it is not justified or consistent with national policy. We would draw the Council's attention to relevant Local Plan policies within Swale and Fareham Borough Councils. Based on detailed viability evidence, both have adopted Local Plans that exempt older people's housing schemes from affordable housing. Furthermore, Fareham exempts older people's housing from their Community Infrastructure Levy charge. Similarly, Maidstone BC has recently adopted a plan that has a lower affordable housing requirement for class C3 retirement housing and exempts housing that falls into the C2 use class from delivering affordable housing. Charnwood, Leicestershire, are towards the latter stages of their Local Plan examination and have recently consulted on main modifications that exempt specialist housing for older people from affordable housing, as well as removing the requirement for M4(3).

The inclusion of a requirement for older persons' housing to deliver affordable housing in line with policy Hou 1 will create an unrealistic over aspirational policy requirement that would no doubt result in protracted discussion at the decision-making stage. This would potentially be adversarial, requiring protracted negotiations with Council officers and their commissioned consultants, and result in difficulties with decision makers expecting policy compliancy. As a minimum, the policy should therefore be amended to make it clear that older person's housing is exempt from all types of affordable housing in line with the conclusions of the Viability Study, to ensure that the plan is deliverable, justified and consistent with national policy.

#### Comments on Viability Study

Whilst we welcome that the Council have tested retirement and extra care housing on brownfield land, we have some concerns with regard to some of the assumptions and conclusions that have been used and if acted upon would be likely to make sheltered and extra care housing not viable. As such the Viability Assessment should be re-run for retirement and extra-care housing using the assumptions recommended below.

We also note that the viability study does not include appraisals on the different typologies for older persons' housing. This is contrary to paragraph 58 of the NPPF.

Initially, if Policy Hou1 is applied to specialist housing for older people, the Council's own commissioned evidence states that it would serve to inhibit such housing from coming forward. Yet despite this conclusion the Viability Study recommends that 'the 10% of dwellings to be for affordable home ownership should also be applied to older person homes'. (para 9.8).

It appears from paragraphs 8.22 & 9.7 of the Viability Study that this recommendation is based on an understanding of the NPPF that the minimum requirement for major housing development is for 10% of the total number of dwellings to be available for affordable home ownership. However, this is an incorrect interpretation of the NPPF in this instance as Paragraph 66 of the NPPF specifically allows for exemptions to this requirement, including for purpose-built accommodation for the elderly.

With respect to viability assumptions themselves, we would direct the Council towards the Retirement Housing Consortium paper entitled 'A briefing note on viability' prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2016 ('RHG Briefing Note') available from

<https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viability-appraisal-issues-RHG-February-2016.pdf>.

The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. These key variables include unit size, unit numbers and GIA, non-saleable communal space, empty property costs, external build cost, sales values, build costs, marketing costs and sales periods and significantly variable benchmark land values. We are also aware that the RHG Briefing Note is being updated and indeed we are informing that process. We therefore have the following comments on the assumptions that should be used within the Viability Assessment with respect to extra care and retirement housing as defined by the PPG on housing for older and disabled people Paragraph: 010 Reference ID: 63-010-20190626.

Unit numbers / GIA / Density

We note that the Viability Assessment has modelled a unit density of 110 dwellings per hectare resulting in a 55 unit scheme being modelled on a 0.5 hectare site for both the Sheltered and Extra-Care schemes, and modelled a 45 unit scheme on a 0.5 hectare site with a density of 90 dwellings per hectare. However, a typical sheltered housing / retirement living scheme would consist of 45 dwellings on a gross site area of 0.45 hectares creating a density of 100 units per hectare. Extra care housing tends to have a lower density and a typical scheme would consist of 60 units on a 0.75 hectare site at a lower density of 80 units per hectare. Therefore, a scheme of 50 units should be modelled for sheltered housing and a scheme of 40 units should be modelled for extra care, both on a site of 0.5 hectares.

#### Unit Size

The Viability Study should amend the 1 bedroom apartment sizes as follows. These have evolved in recent years with the National Space Standards and M4 (2) requirements and allow for additional storage and circulation space to facilitate downsizing:

- 1 bed sheltered 55 sq m
- 1 bed extra care 60 sq m

#### Unit mix

A typical scheme provides 1 and 2 bedroomed apartments using a mix of 60% 1 bed and 40 % 2 bed units on a development. This is the case for both sheltered (retirement) and extra care (retirement living plus) schemes.

#### Professional fees

Given that a large number of specialist housing for older people is delivered on brownfield sites, in our experience these often involve more professional advisors associated with contamination, legal fees, drainage, air quality, overheating, sunlight, noise amongst other areas. We would therefore recommend that a 10% of build cost figure is used for brownfield sites for professional fees rather than 8%.

#### Sales periods

As discussed in the RHG Briefing Note, sales periods of older persons' housing schemes are typically longer for retirement and extra care housing than general needs housing. There is a typical 18 month build period before sales can commence. Sheltered and Extra care schemes cannot be phased but must be fully operational and completed from month 1 of sales / occupation. As detailed within the RHG Briefing Note, once sales commence a rough guide is that 40% of units will be sold at the end of the first year of sales, 30% during the second year of sales and 30% during the third period. This should be considered within the viability modelling. These longer sales periods should therefore be incorporated into the Viability Study. It is not clear currently what sales period has been used.

#### Empty property costs

It is recommended that a standard allowance of £5,000 per unit is assumed as a typical average empty property cost – to cover Council Tax liability on unsold units and service charges (which will be applicable to the whole building from day first resident moves in). This increases to £10,000 for extra care accommodation to reflect higher costs particularly in maintaining care, communal and catering facilities, staff and services and reflecting a slower sales rate than Retirement Living.

#### Developer Return

PPG sets out that 'For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers. However, for specialist housing for older people there is a clear precedent for a return of not less than 20% of gross development value primarily because of the risks associated with such developments. This is consistent with the Inspector's conclusions for appeals such as McCarthy Stone proposal at Redditch (Appeal Ref: 3166677), Churchill Retirement Living proposal at Cheam (Appeal Ref: 3159137) and the Churchill Retirement Living scheme at West Bridgford (Appeal Ref: 3229412) in 2019. 20% profit should therefore be assumed for specialist housing for older people rather than the 17.5% used within the study.

#### Policy costs –BNG

Since the price of statutory BNG units have been published it has enabled it to be determined how much BNG may cost and this needs to be incorporated into the viability assessment at a realistic level. In addition, brownfield site BNG costs are often more substantial than Greenfield, but this very much depends on the site characteristics. For example, if an older persons' housing scheme consisting of 50 units on a 0.5 hectare site needed to purchase one off-site statutory credit, if this was for the cheapest low quality habitat type this would cost £84,000 or £1,680 per unit given that 2 credits are needed per unit. Older Persons housing schemes are ideally located on small windfall sites close to local facilities and it will most likely be that BNG requirements will need to be met largely or entirely off site by contribution.

#### Policy cost – M4 (3)

Despite the draft plan requiring 10% of older persons housing to be built for M4(3) it appears that a £0 additional cost has been incorporated into the Viability study. However, the council should note that any M4(3) requirement needs to be considered on top of M4(2) and would include additional costs for fixtures and fittings, services and controls and additionally room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values and affordability of such housing'. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement.

#### Recommendation

In conclusion, draft Policy HOU1 is therefore considered to be unsound on the grounds that the affordable housing targets are not justified in respect of housing for older people

In order for the plan to be justified, effective and consistent with national policy, the affordable housing requirement for older peoples' housing should be removed The following wording should be added to the policy:

Older person's housing schemes are exempt from providing affordable housing.

#### Q7 Modification

Please see attached representations. In order for the plan to be justified, effective and consistent with national policy, the affordable housing requirement for older peoples' housing should be removed The following wording should be added to the policy:

Older person's housing schemes are exempt from providing affordable housing.

<b>Attachments</b>	<a href="#">1341950 McCarthy Stone.pdf</a>
<b>Comment ID</b>	NULLP1035
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	THE PLANNING BUREAU
<b>Agent Position</b>	Planning Associate
<b>Agent Family Name</b>	Vlach
<b>Agent Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The council should initially recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.</p> <p>It is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons and particularly extra care housing.</p> <p>In relation to specialist housing for older people the policy requires 10% of market dwellings to meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard. Although, this requirement appears to have been tested within the Viability Study, when looking more closely it appears that a £0 level of additional cost has been applied. However, the council should note that any M4(3) requirement needs to be considered on top of M4(2) and would include additional costs for fixtures and fittings, services and controls and additionally room dimensions and layout which include up to 30% more floorspace and corresponding reduction in density, sales values and affordability of such housing'. While some value may be secured for larger units this is unlikely to mitigate the overall loss of units across the proposal as a result of the requirement. An additional cost must therefore be added for this policy requirement. As stated in our response to HOU1 its findings are that older persons' housing is unviable in all scenarios. Therefore, evidence has not been provided to show that compliance with 10% M4(3)A is viable given that all older persons' housing schemes tested have been shown to not be viable. This requirement is therefore contrary to government advice contained in PPG Older and Disabled People (Paragraph: 009 Reference ID: 63-009-20190626 ) which states that planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors.</p> <p>Recommendation:</p> <p>In order for the plan to be justified and effective point 2 of policy HOU3 should be amended as follows:</p> <p>2. On major residential developments and specialist housing for older people, 10% of market dwellings should meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4 (3) B accessible homes standard (or Government equivalent), where there is a demonstrable need in the local area. Older person's housing schemes are exempt from the above requirement.</p>
<b>Q7 Modification</b>	<p>Please see attached representations. In order for the plan to be justified and effective point 2 of policy HOU3 should be amended as follows:</p> <p>2. On major residential developments and specialist housing for older people, 10% of market dwellings should meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4 (3) B accessible homes standard (or Government equivalent), where there is a demonstrable need in the local area. Older person's housing schemes are exempt from the above requirement.</p>
<b>Attachments</b>	<a href="#">1341950 McCarthy Stone.pdf</a>
<b>Comment ID</b>	NULLP1037
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Given Name</b>	McCarthy Stone
<b>Agent Company / Organisation</b>	THE PLANNING BUREAU
<b>Agent Position</b>	Planning Associate
<b>Agent Family Name</b>	Vlach
<b>Agent Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6



<b>Q6 Details</b>	<p>Please see attached representations. Policy PSD6 requires the submission of a Health Impact Assessment for all planning applications for major development. The Council should note that there is a common misconception that older person's housing places an additional burden on healthcare infrastructure and therefore rather than requiring applicants of older person's schemes to show that there is capacity in healthcare systems and to show that the scheme will not have a health impact, the policy should instead recognise the health benefits that delivering older people's housing can bring to individuals.</p> <p>Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p>A report “‘Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living” by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:</p> <ul style="list-style-type: none"> <li>• ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.</li> <li>• Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.</li> <li>• On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’</li> </ul> <p>In addition, specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder.</p> <p>Based on the above, it is not necessary to provide health Impact Assessments for retirement housing schemes.</p> <p>Recommendation:</p> <p>For the plan to be in line with national policy and effective the following wording should be added to the policy to recognise the health benefits of older persons housing.</p> <p>Policy PSD6: Health and Wellbeing</p> <p>The Council will support development that fosters safe, healthy, and active lifestyles. Any new development should: -</p> <p>c. For major development schemes, including non-residential but excluding proposals delivering specialist housing for older people that already provide health benefits, be supported by a core (i.e. screening) health impact assessment. Following the screening assessment, a full (comprehensive) health impact assessment may be required. Development that would have an unacceptable adverse impact, following the Health Impact Assessment, on health or wellbeing will not be The ‘Supporting Information’ should then include the following text:</p> <p>Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessmentpermitted;</p>
<b>Q7 Modification</b>	<p>Please see attached representations. For the plan to be in line with national policy and effective the following wording should be added to the policy to recognise the health benefits of older persons housing.</p> <p>Policy PSD6: Health and Wellbeing</p> <p>The Council will support development that fosters safe, healthy, and active lifestyles. Any new development should: -</p> <p>c. For major development schemes, including non-residential but excluding proposals delivering specialist housing for older people that already provide health benefits, be supported by a core (i.e. screening) health impact assessment. Following the screening assessment, a full (comprehensive) health impact assessment may be required. Development that would have an unacceptable adverse impact, following the Health Impact Assessment, on health or wellbeing will not be The ‘Supporting Information’ should then include the following text:</p> <p>Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessmentpermitted;</p>
<b>Attachments</b>	<a href="#">1341950 McCarthy Stone.pdf</a>

<b>Comment ID</b>	NULLP798
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Given Name</b>	Seddon Homes
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Wedderburn
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.157 - 13.163
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This report has been prepared on behalf of Seddon Homes Limited by Knights, in respect of the Newcastle-under-Lyme Local Plan regulation 19 consultation. Please see attached representations.</p> <p>Local Plan Chapter 13 sets out a series of land allocations to accommodate housing and employment requirements. We agree land should be allocated for development as part to provide a level of certainty over the Plan period in respect of the level and location of new development.</p> <p>We object however to the non-inclusion of the land to the south of High Street, Newchapel and request that it be added to these sites at Chapter 13 of the draft plan. Paragraphs 13.157 – 13.163 cover the Newchapel and Mow Cop ward and we therefore object to these for the reasons set out below.</p> <p>It is important that the plan should seek not only to provide sufficient development opportunities to meet the housing requirement but also to provide a buffer over and above this requirement. Firstly, the NPPF is clear that plans should be positively prepared and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, and additional sites are required to enable the plan requirements to be met and indeed exceeded. NPPF paragraph 69 requires that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</p> <p>Not all sites considered deliverable will be realised during the plan period. It is considered that greater flexibility is required in the housing supply in order to reflect delayed sites and non-delivery and ensure sufficient flexibility over the plan period</p> <p>Additional specific deliverable sites are required in accordance with NPPF paragraph 69. Green Belt tightly surrounds the urban area with no provision for safeguarded land in the local plan between the urban area and the Green Belt. The supply of housing land however is limited to a 10% buffer. We would advocate a 20% buffer of sites be provided, to be available from the outset of the plan and that the sites comprising the buffer include land to the south of High Street, Newchapel.</p> <p>The land to the south of High Street, Newchapel extends to around 5.0 ha in total extent and the site boundaries are shown outlined red on the aerial image at Appendix 1. The site is located to the northern edge of the conurbation, around 2km east of Kidsgrove.</p> <p>The site is divided into 7no. small fields of rough grazing, located to the rear of residential properties off Pennyfields Road, to the northeast, Marsh Avenue and High Street to the north and Station Road to the west. Agricultural land lies to the south and west. There is an established hedge along much of the southern boundary, with the remainder comprising a post and wire fence. There is a churchyard and public house to the southeast corner. The northern, eastern and north western boundaries to the site comprise various types of rear boundaries to properties located along Pennyfields Road, Marsh Avenue, High Street and Station Road.</p> <p>The main northwestern and southeastern parts of the site are controlled by Seddon Homes Limited. Between these, to the south of Marsh Avenue, lies a smaller area of land in Newcastle under Lyme Borough Council ownership. This area is outlined in yellow on the image at Appendix 1 and totals 0.44ha. This area formerly housed a playground, although little trace of this remains.</p> <p>Vehicular access to the site is proposed from the northeast via High Street in the location shown on the plan. An access drawing has been completed and there is previous 'agreement in principle' from the Highway Authority to the access here, on the basis of this proposed design based on standards. The roads in the site vicinity all have footways to the side, are street lit and subject to a 30mph speed limit. Aside from the Green Belt designation, no other restrictive designations apply. The site is located in EA Zone 1 for fluvial flood risk (the lowest risk zone). Seddon Homes have undertaken a coalmining risk assessment in which the conclusion is the site is developable. The site is not located within a Conservation Area, although the church to the southeast is a listed building. Agricultural land classification maps at a regional scale available from the Natural England website and suggest that the land is all likely to be Grade 4.</p> <p>There is no relevant planning history for the site available from the Council's online planning applications database.</p> <p>The site would provide residents with good access to local services via a range of transport modes, other than car use. These include:</p> <ul style="list-style-type: none"> <li>• Convenience Store 1km south (One Stop 103 Silverstone Cres, Stoke-on-Trent ST6 6XP)</li> <li>• Primary School 730m north (Chapel Lane, ST7 4JL) and 740m east Packmoor Ormiston Academy Carr St, Packmoor ST7 4SP</li> </ul>

	<ul style="list-style-type: none"> <li>• Secondary School St Joseph's catholic Academy 1.6km south (Mobberley Rd, Goldenhill, ST6 5RN) and Kidsgrove Secondary School 1.6km west (Gloucester Rd, Kidsgrove, ST7 4DL)</li> <li>• Gordon Hill Medical Centre 100m south east, (High Street, Newchapel).</li> <li>• Packmoor Pharmacy 600m south east (Thomas Street, Packmoor)</li> <li>• Packmoor Community Hall, 650m south east (Lorraine Street, Packmoor)</li> </ul> <p>Kidsgrove town centre lies around 2km to the west and Tunstall town centre around 3.5 km south, offering a wide choice of local services. There are bus stops on High Street, providing buses to Kidsgrove and Hanley City Centre. Kidsgrove rail station is at around 2.5km with services to Crewe, Stoke, Derby and Manchester.</p> <p>The site is proposed to be brought forward by Seddon Homes, a family-owned house builder based in the Northwest, with a diverse range of current residential developments bringing forward homes of a wide range of types and sizes on sites from Staffordshire to Lancashire. The closest current development by Seddon Homes is to the east of the A34 at Ashway Park, Bradwell, Newcastle-under-Lyme, Newcastle ST5 8FB, where Seddon are on site delivering 85 homes ranging from 2 – 4 beds. They are also on site at another nearby location at Pepper Street, Keele and have recently completed a joint venture with Keele University delivering private and affordable housing and student accommodation.</p> <p>The proposed development would provide a policy compliant proportion of affordable housing and where appropriate the potential for affordable housing provision over and above this level could be explored, proving significant assistance to the Council in meeting the targets for affordable housing.</p> <p>Given that the Land south of High Street, Newchapel is a greenfield site, that there are no access constraints or any known physical constraints or restrictive designations and the site is controlled by a housebuilder, it is therefore considered that the site can begin to deliver housing within 5 years following adoption of the Local Plan. The indicative capacity is approximately 130 dwellings. Seddon Homes would seek to submit a planning application once the land is removed from the Green Belt and anticipate a first year build out rate of approximately 20 units, then between 35-40 in subsequent years.</p> <p>We therefore object to the non-inclusion of the land to the south of High Street, Newchapel and as an allocated housing site at Chapter 13 of the draft plan. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <p>a) Not "Positively prepared", as it fails to ensure the area's objectively assessed needs are fully met;</p> <p>b) Not "Effective", as it would not help ensure sufficient housing is delivered over the plan period,</p> <p>c) Not "Consistent with national policy" as it fails to reflect the specific requirements of NPPF paragraph 69 that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the progress of the proposals for the development of the site for housing.
<b>Attachments</b>	<a href="#">1364190 Seddon Homes Ltd supporting statement.pdf</a> <a href="#">1364190 Seddon Homes Landscape Appraisal.pdf</a> <a href="#">1364190 Seddon Homes Ltd_Appendix 1_location plan.pdf</a>
<b>Comment ID</b>	NULLP802
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Given Name</b>	Seddon Homes
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Wedderburn
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This report has been prepared on behalf of Seddon Homes Limited by Knights, in respect of the Newcastle-under-Lyme Local Plan regulation 19 consultation. Please see attached representations.</p> <p>The policies map identifies 14 sites to be deleted from the Green Belt and allocated for housing development in the Local Plan. We object to the omission of the land south of High Street, Newchapel from the sites deleted from the Green Belt.</p> <p>We have set out above the reasons why we consider that the land to the south of High Street, Newchapel and request that it be added to the allocated sites in the draft plan. We consider that the land south of High Street, Newchapel should be removed from the Green Belt for the reasons detailed below.</p> <p>The Green Belt at this point forms part of the wider North Staffordshire Green Belt, originally defined in 1967. Although there were some alterations made via the North Staffordshire Green Belt Local Plan (adopted 1983) and the Stoke-on-Trent City Plan (adopted in 1993) there has been no other amendments made since that time as the Joint Core Strategy adopted in 2009 did not alter the Green Belt boundary and the City Plan Green Belt policies remained as saved policies. The Green Belt boundary is therefore of some considerable age</p>

The dwellings along High Street, Pennyfields Road and Marsh Avenue are included in a settlement boundary that extends around a wider urban area of Kidsgrove and Talke. The Land south of High Street Newchapel site however is currently within the Green Belt. The allocation of the land for housing development would therefore require a modification to the Green Belt boundary. This can be achieved through the development plan review process, however under paragraph 141 of the NPPF exceptional circumstances are required for this. The NPPF states that such circumstances need to be fully evidenced and justified through the development plan process.

As set out in Section 2 above, the Housing Spatial Strategy Topic Paper prepared as part of the evidence base refers to the Housing and Economic Needs Assessment (2023) and concludes that exceptional circumstances test in NPPF paragraph is met in order to address objectively assessed development needs over the plan period to 2040 and this provides a justified basis for Policy PSD5: Green Belt to amend the Green Belt boundary in order to bring forward of site allocations within the Green Belt. We endorse this conclusion.

In respect of Land south of High Street Newchapel site can also be released without harm to the wider Green Belt and its purposes.

Ove Arup and Partners ('Arup') was appointed by Newcastle under- Lyme Borough Council and Stoke-on-Trent City Council to prepare a site review methodology and complete site assessments for the Green Belt sites being considered for release through the emerging joint Local Plan. Their report of December 2020 (based on an initial study from November 2017) sets out that the Local Plan strategic objectives were applied to these sites, assessing them for their 'strategic fit' and creating a shorter list of "contender sites". A Green Belt assessment of these contender sites was then undertaken by Ove Arup and a June 2023 report then provided advice on safeguarded land, compensatory improvements, exceptional circumstances and the additional site assessments.

The land promoted in this representation forms the northern part of contender site NC11. Appendix F of the 2020 Ove Arup study provides a detailed table setting out the assessment of the contender sites against the Green Belt purposes. It is important to stress therefore that the site was assessed as part of a much wider parcel of land, rather than on its own merit as a specific development site within the green belt (the land has, for example, development to 3 sides, being contained by properties along High Street to the northeast, Marsh Ave and Pennyfields road to the north west and Station Road to the south east). The site is well contained by built form on three sides and a strongly defined and permanent defensible boundary to the Green Belt can be achieved;

The NPPF sets out the purposes of the Green Belt as a list at paragraph 143. This text is reproduced below, followed by the text from Appendix F of the Council's Ove Arup Dec 2020 report referring to contender site NC11 and then Seddon Homes' position on the contribution of the Land south of High Street site to these aims (please see attached representations)

Paragraph 148 of the NPPF states that, when defining Green Belt boundaries, local planning authorities should define boundaries "using physical features that are readily recognisable and likely to be permanent". As described above the Land south of High Street site is enclosed by development on 3 sides and open to the countryside in only a southwesterly direction where the land slopes away. This remaining side forms a straight edge with a clear field boundary comprising a fence / hedgerow, with the churchyard at the south east corner. As such new housing here would be read as a continuation of the pattern of development already seen in the area. Development of the site would allow creation of a far more clearly defined edge to the built form and to the Green Belt.

A Landscape and Visual Appraisal of the Land south of High Street, Newchapel, Kidsgrove has been prepared by PGLA Landscape Architects for Seddon Homes to analyse the potential effects that residential development at would have on the surrounding landscape and visual amenity. This report forms Appendix 1 to these representations.

The LVA notes that the site sits in South Kidsgrove Coalfield Farmlands Landscape Character Area as assessed in the NULBC Landscape and Visual Assessment work.. This LCA has been assessed as having a medium sensitivity. The attached report by PGLA considers the landscape character baseline, the sensitivity of visual receptors, the magnitude of change and the potential significance of effects in accordance with the Guidelines for Landscape and Visual Impact Assessments, third edition.

In landscape terms the nature of effects (magnitude of change) has been assessed as imperceptible and the overall effects will be negligible. In visual terms it was concluded likely that the site will only be briefly visible when directly adjacent to the site at the access points, with little to no overlooking of the proposed development and little to no visual connection with the surrounding road network. There will be localised views of the proposed development, from the public footpaths however, these can be mitigated with the introduction of landscape treatments including a substantial landscape buffer to the boundaries. The existing intermittent hedges along the boundary will be retained where possible and reinforced with native planting to extend the landscape buffer with the settlement edge and the wider landscape. The site will also be viewed in the context of the existing settlement edge and will not be seen as incongruous to its surroundings.

Mitigation can also be included and boundary vegetation and planting will mature along with street tree planting and reduce any adverse effects of the development over time.

In conclusion, the LVA identifies that the long-term residual effects of the development are not likely to exceed minor adverse to the overall landscape and visual amenity. Potential adverse effects that have been identified to be present at the operational stage, especially within the site and its setting will be reduced and offset by the mitigation provided in the potential planting scheme described within the landscape strategy. Therefore, the report "demonstrates that the site has the potential to accommodate the proposed residential development without causing undue harm to the landscape character, visual amenity of the site and surrounding countryside and the openness of the Green Belt".

In terms of potential amendment of Green belt boundaries here, the Land south of High Street site is well-contained within the landscape, with significant existing defensible boundaries that would endure beyond the plan period. Although the area southwest of the site is open countryside, the release of this infill site will not create a precedent for continuing unchecked development into the Green Belt. Being bound by existing built features and with a clear straight edge to the remaining side the Land south of High Street site is therefore defined by physical features that can provide a strong and permanent boundary to the Green Belt.

	<p>We therefore conclude that the Land south of High Street Newchapel site can be released without harm to the wider Green Belt and its purposes. We therefore object to the non-inclusion of the land as a site to be removed from the Green Belt.</p> <p>With regard to NPPF para 35 the Local Plans must be prepared in accordance with the 'Tests of Soundness'. We consider this element of the Local Plan does not accord with the tests of soundness set out at NPPF paragraph 35 as it is:</p> <p>a) Not "Positively prepared", as it fails to ensure the area's objectively assessed needs are fully met;</p> <p>d) Not "Effective", as it would not help ensure sufficient housing is delivered over the plan period,</p> <p>e) Not "Consistent with national policy" as it fails to reflect the specific requirements of NPPF paragraph 69 that planning policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. .</p> <p><b>CONCLUSION</b></p> <p>To assist in delivering local housing targets the Council should allocate the land at High Street, Newchapel as a residential development site. We therefore make representations in response to the following sections of the plan on behalf of Seddon Homes Limited: Support the release of land from the Green Belt for housing development via Policy PSD5.</p> <ul style="list-style-type: none"> <li>• Object to the omission of land to the south of High Street, Newchapel as a site allocation in Chapter 13, paragraphs 13.157 – 13.163.</li> <li>• Object to the omission on the Policies Map of the land south of High Street, Newchapel as an amendment to the Green Belt and housing site allocation.</li> </ul> <p>The land south of High Street, Newchapel should be brought forward for housing development during the plan period (including the small parcel of Council-owned land). The land south of High Street site is available, suitable, and deliverable with a housebuilder in place and should be allocated for housing development in the Local Plan to assist in meeting the housing requirement.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the progress of the proposals for the development of the site for housing.
<b>Attachments</b>	<a href="#">1364190 Seddon Homes Ltd_Appendix 1_location plan.pdf</a> <a href="#">1364190 Seddon Homes Ltd supporting statement.pdf</a> <a href="#">1364190 Seddon Homes Landscape Appraisal.pdf</a>
<b>Comment ID</b>	NULLP786
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Given Name</b>	Seddon Homes
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Wedderburn
<b>Agent Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This report has been prepared on behalf of Seddon Homes Limited by Knights, in respect of the Newcastle-under-Lyme Local Plan regulation 19 consultation. Please see attached representations. These representations refer in particular to land south of High Street, Newchapel, shown on the plan at Appendix 1 ("The Site"). The statement is accompanied by a Part A form and 3no. separate Part B response forms and responds to the draft plan as follows:</p> <ol style="list-style-type: none"> <li>1. To support the release of land from the Green Belt for housing development via Policy PSD5.</li> <li>2. To object to the omission of land to the south of High Street, Newchapel as a site allocation in Chapter 13, paragraphs 13.157 – 13.163.</li> <li>3. To object to the omission on the Proposals Map of the land south of High Street, Newchapel as an amendment to the Green Belt and housing site allocation.</li> </ol> <p>The representations are also accompanied by a Landscape and Visual Appraisal by landscape consultants PGLA.</p> <p>The principle of release of Green Belt land as set out in policy PSD5 is supported</p> <p>Policy PSD5 'Green Belt' states that "The Plan will alter the Green Belt boundary" and the policy indicates that sites are to be removed from the Green Belt and allocated for housing and employment.</p> <p>We support the principle of Green Belt release in PSD5 for the reasons set out below.</p> <p>Housing delivery is a key aim of national and local policy. NPPF paragraph 60 makes clear that the Government's objective is "significantly boosting the supply of homes". Nationally housing is not being delivered at the level required to meet needs. The previous government had a housebuilding a target of 300,000 homes a year and similarly the current government's target is for "1.5 million new homes over the next parliament". The total number of new homes registered in 2022 was however just 189,009 and fell further to 105,449 in 2023 (figures from NHBC1).</p>



	<p>The emphasis given to supporting housing delivery has increased further under the new government. With planning reforms being stated as central to the government's plan for growth and a Planning and Infrastructure Bill aims to "speed up and streamline the planning process to build more homes of all tenures". A revised national planning policy framework is being consulted upon at the time of writing with changes focussed on increasing housing delivery and it is evident that the government is seeking a significant housing boost to supply.</p> <p>Like many districts however, Newcastle under Lyme's ability to deliver housing land is significantly constrained by a tightly drawn Green Belt. Protecting the Green Belt should not be at the expense of meeting housing need and in accordance with NPPF paragraph 20 the Local Plan must make sufficient provision for housing, for infrastructure, for schools and other community infrastructure and for, employment land, including where ne.</p> <p>Without Green Belt release, the alternatives will present a less effective spatial strategy, with more sites beyond the Green Belt to be allocated, leading to less sustainable travel patterns and a need for new services and infrastructure in smaller settlements. And unless the new Local Plan brings forward sufficient land in a timely fashion planning by appeal may be seen, where sites come forward in locations that may not have been anticipated in the Plan.</p> <p>A Green Belt review is therefore urgently required in order to identify areas of lower value where development can come forward without compromising the purposes of Green Belt designation.</p> <p>The Housing Spatial Strategy Topic Paper prepared as part of the evidence base alongside the plan refers to the Housing and Economic Needs Assessment (2023) concludes as follows:</p> <ul style="list-style-type: none"> <li>• There is a justified need to deliver a minimum of 8,000 homes (400 dwellings per annum) over the plan period to 2040 and the local plan spatial strategy needs to identify sufficient housing supply accordingly.</li> <li>• There is an objectively assessed requirement for the provision of a minimum of 63ha of employment land over the plan period to 2040.</li> <li>• The requirements for Exceptional Circumstances in NPPF para 145 has been met and there is a fully justified case to amend the Green Belt to provide for local housing and employment needs It states that the Council has comprehensively reviewed all reasonable alternative options to Green Belt release in accordance with national policy.</li> </ul> <p>The above conclusions provide a justified basis for Policy PSD5: Green Belt to amend the Green Belt boundary in order to bring forward a specific number of site allocations within the Green Belt. We therefore endorse the conclusion that exceptional circumstances exist and we support the approach of Green Belt release.</p> <p>Further to Policy PSD5 we consider this element of the Local Plan to be in accordance with the test of soundness set out at NPPF paragraph 35:</p> <ol style="list-style-type: none"> <li>a) "Positively prepared", in seeking to meet the area's objectively assessed needs;</li> <li>b) "Justified", in that it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>c) "Effective", as it would be deliverable over the plan period,</li> <li>d) "Consistent with national policy" as it reflects the specific requirements of NPPF paragraph 20 and paragraph 145 in particular.</li> </ol>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To explain the respondent's case and provide details in respect of the progress of the proposals for the development of the site for housing.
<b>Attachments</b>	<a href="#">1364190 Seddon Homes Landscape Appraisal.pdf</a> <a href="#">1364190 Seddon Homes Ltd supporting statement.pdf</a> <a href="#">1364190 Seddon Homes Ltd_Appendix 1_location plan.pdf</a>

<b>Comment ID</b>	NULLP380
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Consultation (Legal Compliance)</b></p> <p>We note that few of the issues raised at the Regulation 18 stage have been addressed. One of the issues raised was the failure to run a 'Gunning' compliant consultation. We note that this was ignored.</p> <p>It is unclear how our previous comments on Site AB2 were taken into account, or whether they were taken into account.</p> <p>Our view remains that the Regulation 18 consultation was unlawful.</p>
<b>Comment ID</b>	NULLP384
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>PSD1 Overall Development Strategy</b></p> <p>The targets for new housing in the borough and in the Audley Parish are unnecessarily high and will involve the destruction of valuable greenbelt and serve to further undermine the weaker housing markets in the Borough, Stoke-on-Trent and Crewe.</p> <p>Despite the completion of 2,240 dwellings between 2011/12 and 2020/21, the population actually decreased (from 123,871 to 123,300) and the number of households grew by only 849. Government data on empty homes indicates that there were 1,688 empty homes in the Borough in October 2023. The 2021 census indicates that there were 53,423 households in 2021, whereas council tax records indicate that there were 57,627 dwellings.</p> <p>In terms of housing costs, Newcastle-under-Lyme is one of England's lowest priced places to live. In 2023, the average cost of a first-time buyer's home was £176,000 compared to the national average of £241,502. The ONS official house price to income ratio was 5.52 in 2023, compared to the national average of 8.14. For Audley, the ratio is lower still, at 4.12. Private rents averaged £705 per month in 2023, compared to the national average of £1,279.</p> <p>The key issues in Audley and the Borough as a whole concern the range of housing options available and the need to tackle endemic under-occupation by older households. Audley lacks options for older households wishing to downsize or younger people wanting apartments. In Audley and the Borough, the population is ageing. In 2023, 9,731 people moved in from outside areas compared to only 7,719 out movers.</p> <p>The planned level of growth will simply accelerate problems of urban decay, especially in Stoke-on-Trent. There is no economic or social case for the numbers involved.</p>
<b>Comment ID</b>	NULLP388
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No

<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<b>Policy PSD 4: Development Boundaries and the Open Countryside</b> There is still no recognition of role of Neighbourhood Plans in further enabling and shaping development.
<b>Comment ID</b>	NULLP392
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy CRE 2: Renewable Energy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<b>Policy CRE 2: Renewable Energy</b> The focus of the policy should be widened beyond solar and wind energy, for example to include geo-thermal energy from mineshafts. This is addressed in the submitted Audley Neighbourhood Plan.
<b>Comment ID</b>	NULLP381
<b>Order</b>	13
<b>Number</b>	3
<b>Title</b>	Context
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Audley Rural Parish Neighbourhood Steering Group wish to support the comments submitted by Audley Rural Parish Council and ask that these comments are taken into consideration as the response from the Steering Group. This is in addition to earlier comments submitted by ARNP for the Issues and Options Consultation in 2022 and also the First Draft Local Plan Consultation in August 2023. Please do not summarise the response below, to avoid taking the comments out of context.  ARNP would strongly object to the proposals for Audley Parish, in particular the allocation of site AB2 and AB2A.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Responsible for the development of the Audley Rural Neighbourhood Plan
<b>Q10 File 1</b>	6386419
<b>Q10 File 2</b>	6386418
<b>Attachments</b>	<a href="#">Audley Parish - Natural Capital Assessment FINAL REPORT Oct 24.pdf</a> <a href="#">NULBC Local Plan consultation 2024 ARNP response.pdf</a>
<b>Comment ID</b>	NULLP385
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2 and RET1

Q5 Legally compliant	No
Q5 Sound	No
Q6 Details	<p><b>Policy PSD 3: Distribution of Development</b></p> <p>ARNP notes that Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.</p>
Comment ID	NULLP382
Order	16
Title	Vision for the Borough
Consultee Company / Organisation	Audley Rural Neighbourhood Plan Steering Group
Consultee Position	Secretary
Consultee Family Name	ARNP
Consultee Given Name	AR
Q5 Legally compliant	No
Q5 Sound	No
Q6 Details	<p><b>Sites AB2 and AB2A</b></p> <p>ARNP strongly objects to the proposed allocation of Site AB2/AB2A (A500/M6).</p> <p>The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.</p> <p>These recent reports appear to have been ignored.</p> <p>Removal of the site(s) from the green belt would undermine the purposes for green belts set out in the NPPF, in particular by allowing major incursion and encroachment into the countryside and undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside.</p> <p>The economic impact on the conurbation would be negative, due to:</p> <ul style="list-style-type: none"> <li>the remoteness of the site(s);</li> <li>the impact on the viability of alternative urban sites in the conurbation.</li> <li>Harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to local food growing capacity and agricultural employment.</li> </ul> <p>The traffic impacts would be negative, including:</p> <ul style="list-style-type: none"> <li>Generation of road-based traffic and lack of sustainable transport alternatives;</li> <li>Traffic impacts on the rural character of the area;</li> <li>Impacts on the amenity and safety of rural roads and lanes.</li> </ul> <p>The development of this site would be unsustainable and environmentally harmful, due to:</p> <ul style="list-style-type: none"> <li>biodiversity impacts on rural lanes, where they need to be widened, including</li> <li>destruction of adjoining landscapes;</li> <li>development of greenfield land in an unsustainable location, remote from the</li> <li>existing urban conurbation;</li> <li>a range of significant adverse impacts (visual, noise, light, disturbance, air quality).</li> </ul> <p>The development would introduce a major urban employment site within a rural parish, near to small rural villages and remote from local services.</p> <p>The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE green belt assessment reports.</p> <p>The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...".</p> <p>The Table on page N37 identifies that site AB2 would have major negative impacts on:</p> <p>'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.</p> <p>We note that positive impacts are identified for 'Climate Change' and 'Economy'. We believe that this finding is perverse. It is difficult to see how the development of a remote site, well outside of the urban conurbation, involving the loss of agricultural land and relying on road based travel could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation has clearly not been taken into account.</p> <p>Site variation AB2A is not mentioned so presumably has not been assessed.</p> <p>Tables N10 and N11 set out growth strategy options. We note that option 6D does not include site AB2 and delivers better scores/outcomes.</p> <p>The Newcastle-under-Lyme Landscape &amp; Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.</p>

	<p>The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network. A copy of this report is included.</p> <p>The Strategic Housing &amp; Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable &amp; Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.</p> <p>Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under- Lyme &amp; Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.</p> <p>Development of AB2 would be harmful to the local economy, community and environment.</p> <p>The site assessment is not supported by evidence and assessments (though we note the site has been deleted from updates of some of those assessments). Allocation of the site conflicts with several of the proposed policies of the Local Plan.</p> <p><b>Housing Site Allocations AB12, AB15 and AB33</b></p> <p>Sites AB12, AB15 and AB33 are all within Audley Parish. ARNP accepts that some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. ARNP would emphasise that green belt release should only occur in exceptional circumstances, but accepts that there are no alternative sites that would not involve green belt release.</p> <p>The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>
<b>Comment ID</b>	NULLP396
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET 1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy RET 1: Retail</b></p> <p>The policy is still out-of-kilter with current thinking on high street recovery. There needs to be far more emphasis on diversification and uses that bring people into towns and high streets, for example food and drink, recreation, cultural uses, community facilities and other local facilities.</p> <p>Note earlier comments regarding Audley being incorrectly listed as a District Centre - when it should be a Local Centre.</p>
<b>Comment ID</b>	NULLP400
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No



<p><b>Q6 Details</b></p>	<p><b>Sites AB2 and AB2A</b></p> <p>ARNP strongly objects to the proposed allocation of Site AB2/AB2A (A500/M6).</p> <p>The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.</p> <p>These recent reports appear to have been ignored.</p> <p>Removal of the site(s) from the green belt would undermine the purposes for green belts set out in the NPPF, in particular by allowing major incursion and encroachment into the countryside and undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside.</p> <p>The economic impact on the conurbation would be negative, due to:</p> <ul style="list-style-type: none"> <li>the remoteness of the site(s);</li> <li>the impact on the viability of alternative urban sites in the conurbation.</li> <li>Harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to local food growing capacity and agricultural employment.</li> </ul> <p>The traffic impacts would be negative, including:</p> <ul style="list-style-type: none"> <li>Generation of road-based traffic and lack of sustainable transport alternatives;</li> <li>Traffic impacts on the rural character of the area;</li> <li>Impacts on the amenity and safety of rural roads and lanes.</li> </ul> <p>The development of this site would be unsustainable and environmentally harmful, due to:</p> <ul style="list-style-type: none"> <li>biodiversity impacts on rural lanes, where they need to be widened, including</li> <li>destruction of adjoining landscapes;</li> <li>development of greenfield land in an unsustainable location, remote from the</li> <li>existing urban conurbation;</li> <li>a range of significant adverse impacts (visual, noise, light, disturbance, air quality).</li> </ul> <p>The development would introduce a major urban employment site within a rural parish, near to small rural villages and remote from local services.</p> <p>The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE green belt assessment reports.</p> <p>The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...".</p> <p>The Table on page N37 identifies that site AB2 would have major negative impacts on: 'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.</p> <p>We note that positive impacts are identified for 'Climate Change' and 'Economy'. We believe that this finding is perverse. It is difficult to see how the development of a remote site, well outside of the urban conurbation, involving the loss of agricultural land and relying on road based travel could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation has clearly not been taken into account.</p> <p>Site variation AB2A is not mentioned so presumably has not been assessed.</p> <p>Tables N10 and N11 set out growth strategy options. We note that option 6D does not include site AB2 and delivers better scores/outcomes.</p> <p>The Newcastle-under-Lyme Landscape &amp; Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.</p> <p>The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network. A copy of this report is included.</p> <p>The Strategic Housing &amp; Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable &amp; Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.</p> <p>Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under-Lyme &amp; Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.</p> <p>Development of AB2 would be harmful to the local economy, community and environment.</p> <p>The site assessment is not supported by evidence and assessments (though we note the site has been deleted from updates of some of those assessments). Allocation of the site conflicts with several of the proposed policies of the Local Plan.</p>
<p><b>Comment ID</b></p>	<p>NULLP390</p>
<p><b>Order</b></p>	<p>34</p>

<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy PSD 7: Design
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy PSD 7: Design</b></p> <p>The term 'beautiful' should be removed, given the proposed changes to the NPPF. ARNP note that there is still insufficient emphasis on permeability, connectivity, green infrastructure and quality of the public realm.</p> <p>There is no mention of the National Design Guide 2021 and the ten priorities for design that it identifies.</p>
<b>Comment ID</b>	NULLP394
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy HOU 2: Housing Mix, Density and Standards
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy HOU 2: Housing Mix, Density and Standards</b></p> <p>Appropriate densities would vary across the Borough and depend on a wider range of factors than those mentioned in the policy.</p>
<b>Comment ID</b>	NULLP398
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy SE9: Historic Environment</b></p> <p>It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on heritage.</p>
<b>Comment ID</b>	NULLP389
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No

**Q6 Details****Policy PSD 5: Green Belt and Safeguarded Land**

See comments also below on housing site allocations and green belt release. We object to the release of site AB2 or AB2A from the green belt, as it would harm green belt purposes relating to safeguarding the countryside from encroachment and assisting in urban regeneration, contradicting Policy PSD 5.

**Sites AB2 and AB2A**

ARNP strongly objects to the proposed allocation of Site AB2/AB2A (A500/M6).

The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.

These recent reports appear to have been ignored.

Removal of the site(s) from the green belt would undermine the purposes for green belts set out in the NPPF, in particular by allowing major incursion and encroachment into the countryside and undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside.

The economic impact on the conurbation would be negative, due to:

- the remoteness of the site(s);
- the impact on the viability of alternative urban sites in the conurbation.
- Harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to local food growing capacity and agricultural employment.

The traffic impacts would be negative, including:

- Generation of road-based traffic and lack of sustainable transport alternatives;
- Traffic impacts on the rural character of the area;
- Impacts on the amenity and safety of rural roads and lanes.

The development of this site would be unsustainable and environmentally harmful, due to:

- biodiversity impacts on rural lanes, where they need to be widened, including
- destruction of adjoining landscapes;
- development of greenfield land in an unsustainable location, remote from the
- existing urban conurbation;
- a range of significant adverse impacts (visual, noise, light, disturbance, air quality).

The development would introduce a major urban employment site within a rural parish, near to small rural villages and remote from local services.

The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE green belt assessment reports.

The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...".

The Table on page N37 identifies that site AB2 would have major negative impacts on:

'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.

We note that positive impacts are identified for 'Climate Change' and 'Economy'. We believe that this finding is perverse. It is difficult to see how the development of a remote site, well outside of the urban conurbation, involving the loss of agricultural land and relying on road based travel could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation has clearly not been taken into account.

Site variation AB2A is not mentioned so presumably has not been assessed.

Tables N10 and N11 set out growth strategy options. We note that option 6D does not include site AB2 and delivers better scores/outcomes.

The Newcastle-under-Lyme Landscape & Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.

The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network. A copy of this report is included.

The Strategic Housing & Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable & Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.

Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.

Development of AB2 would be harmful to the local economy, community and environment.

	<p>The site assessment is not supported by evidence and assessments (though we note the site has been deleted from updates of some of those assessments). Allocation of the site conflicts with several of the proposed policies of the Local Plan.</p> <p><b>Housing Site Allocations AB12, AB15 and AB33</b></p> <p>Sites AB12, AB15 and AB33 are all within Audley Parish. ARNP accepts that some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. ARNP would emphasise that green belt release should only occur in exceptional circumstances, but accepts that there are no alternative sites that would not involve green belt release.</p> <p>The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>
<b>Comment ID</b>	NULLP393
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy HOU 1: Affordable Housing
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy HOU 1: Affordable Housing</b></p> <p>ARNP would again emphasise the importance of affordable housing policy being applied consistently through the development management process, including for housing development in rural settlements.</p>
<b>Comment ID</b>	NULLP397
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy SE1: Pollution, Contamination and Amenity</b></p> <p>Site(s) AB2 or AB2A would not comply with the policy due to adverse impacts (light, noise and air quality).</p>
<b>Comment ID</b>	NULLP383
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No

<b>Q6 Details</b>	<b>Strategic Objectives</b> ARNP supports the strategic objectives and notes that built heritage has been added, but with no mention of culture, or its potential in helping achieve economic transformation. Given the emphasis many local authorities place on culture and economic development, this is a surprising omission.
<b>Comment ID</b>	NULLP387
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<b>Policy PSD 3: Distribution of Development</b> ARNP notes that Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.
<b>Comment ID</b>	NULLP391
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy CRE 1: Climate Change
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<b>Policy CRE 1: Climate Change</b> ARNP don't understand the meaning of clause 7. There is still nothing on walkable neighbourhoods (including mixed use, retention of local facilities, support for home working and ease of pedestrian movement). Audley village is an example of a walkable neighbourhood. There should be a far greater emphasis on climate resilience (for example, addressing overheating of homes and water capture).
<b>Comment ID</b>	NULLP395
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP
<b>Consultee Given Name</b>	AR
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<b>Policy EMP 1: Employment</b> ARNP would strongly object to strategic employment site allocation AB2.  <b>Sites AB2 and AB2A</b> ARNP strongly objects to the proposed allocation of Site AB2/AB2A (A500/M6). The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.



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Site variation AB2A is not mentioned so presumably has not been assessed.

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The Newcastle-under-Lyme Landscape & Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.

The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network. A copy of this report is included.

The Strategic Housing & Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable & Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.

Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.

Development of AB2 would be harmful to the local economy, community and environment.

The site assessment is not supported by evidence and assessments (though we note the site has been deleted from updates of some of those assessments). Allocation of the site conflicts with several of the proposed policies of the Local Plan.

<b>Comment ID</b>	NULLP399
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Audley Rural Neighbourhood Plan Steering Group
<b>Consultee Position</b>	Secretary
<b>Consultee Family Name</b>	ARNP

<b>Consultee Given Name</b>	AR
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Conclusion</b></p> <p>ARNP believe that the Local Plan is fundamentally flawed. Allocation of site AB2/AB2A is in contradiction to the Local Plan's own evidence base and emerging policies and also inconsistent with national policy and guidance. It would cause substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire conurbation.</p> <p>There are clear problems in terms of soundness, especially in terms of justification, effectiveness (including cross-boundary strategic considerations) and consistency with national policy.</p>

<b>Comment ID</b>	NULLP352
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Site T&amp;G 8 inclusion at Scrutiny Committee</p> <p>The land was acquired for the specific purpose of being kept as allotments. The proposed change of use to accommodation for travellers would mean a loss of potential allotment provision in Silverdale and would undermine the remediation of the land in the future for estending Acre Allotments. requires Secretary of State's consent.</p> <p>The proposed use passes directly through the centre of a current statutory allotment site. Acre Allotments was recorded in the 1900 OS Map and in previous years, having been previously designated so for the use of Silverdale's citizens.</p> <p>The allocation decision is unsound, because</p> <p>1 There is a long lease in place between the Borough Council and Silverdale Parish Council for the use of part of land, including the access road.</p> <p>2 The proposed road access to T&amp;G8 would be shared with Acre Allotment Association, sub tenants of Silverdale Parish Council. The proposed sharing of the road access could only occur if the road was improved to allow transport by vehicles pulling trailers. The road improvement would be necessary condition and coupled with new mains supplies for the pitches would threaten the continuation of the Allotment Association.</p> <p>3 Extensive remediation is required where there is a history of unregulated deposit of different kinds of toxic waste harmful to human ranging from unremedied cattle and pig faeces to heavy metal contamination (from mining and waste accumulation) and also buried asbestos.</p> <p>4 The development of this site would be unsustainable and environmentally harmful in another context. Northwest of the proposed access road is the Racecourse Community Woodland, between Mill Street and Park Street, containing many mature native trees and there are local springs which generate an ecology that would be harmed by the traffic and development proposed.</p> <p>5 The single lane traffic access to the Acre Allotment Association is unsuitable. The access road is best classified as a country lane so the proposed development would fall foul of the policy of biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscape.</p> <p><b>Modification:</b> The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p> <p>Evidence See attachment photograph with an alterative access via Maries Way and Cemetery Road. This would not impinge on the Allotment Association in growing local food.</p> <p>Block Plan</p> <p>Nature England Image showing the Racecourse Community Woodland</p> <p>Staffordshire Wildlife Trust Ecology Record</p> <p>Access road is a country lane and should be protected</p> <p>Asbestos in several locations.</p> <p>Passt Evidence of Colliery Working</p>
<b>Q7 Modification</b>	<p>The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p>

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	The borough council have acted too eagerly bringing this site forward without prior notice to the Allotment Association who have used the main part of the site for many years and the Parish Council which has the benefit of a lease for three residents of Silverdale to grow food in their area.
<b>Q10 File 1</b>	6386404
<b>Q10 File 2</b>	6386403
<b>Q10 File 3</b>	6386405
<b>Attachments</b>	<a href="#">T&amp;G8 Block Plan showing Racecourse Community Woodland.docx</a> <a href="#">Alternative Access from Maries Way 051024.JPG</a> <a href="#">Contaminated Land Lane 4 Animal Pen1 051024.JPG</a>
<b>Comment ID</b>	NULLP375
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	3)Rural Centres p21
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The paragraph sets out 6 rural centres, excluding the parish of Silverdale based on the methodology adopted in the Rural Areas Topic Paper (ED005). There is a decision to be made whether Silverdale Parish Council is a rural centre yet there is no evidence of whether and how Silverdale was excluded from the 6 centres.</p> <p>Furthermore, there is a case to be made for Silverdale Parish Council to be a rural centre on the grounds of historic culture as a key and original mining village for the early industrialisation. A detailed history of the origins of the settlement is available (Nixon 2018; see reference in the attachment) giving credibility to the nature of Silverdale as an original urban village from the industrialisation begun in the late 18th century.</p> <p>Silverdale Parish Council have explored this question and inserted comments about the special circumstances in its favour during the previous 2023 consultation but there is no record of the matter being taken up.</p> <p>Please note the current issue that a parish which had about half the land use within the green belt will potentially lose 25% of the total Green Belt acreage under the current Local Plan land allocation scenario.</p>
<b>Q7 Modification</b>	Classify Silverdale Parish Council as Rural and Local Centre within the Settlement Hierarchy.
<b>Q10 File 1</b>	6386410
<b>Q10 File 2</b>	6386409
<b>Q10 File 3</b>	6386411
<b>Attachments</b>	<a href="#">Silverdale as a Rural and Local Centre defined by its green belt location.docx</a> <a href="#">Monument Drone 22nd March 2023 492.JPG</a> <a href="#">Silverdale Road 27th March 2023 131.JPG</a>
<b>Comment ID</b>	NULLP401
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23 Land at Cemetery Road Park Road
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	For the first time since the scheme for the former golf course was muted in 2013, the proposals in 2024 cover a single-entry primary school, local centre/ health centre and a country park with 4 new separate settlements. These were inspired in a document known as Lime Park written for the borough council as land owner and uploaded elsewhere in the portal ( see HOU1 27 Aug.).

	<p>The published plans (Lime Park:17) show vehicular access from Keele Rd via a spur into 3 parcels of SP11 (1,2 and 3) and access from Ashbourne Drive to SP 11 (1,2 and 3).</p> <p>Racecourse is the main access point to SP 11(4). But SP23 adjoins the site. So what is the relationship between SP11(4) and SP23? The Local Plan Policy SP23 4) on p175 states it is Cemetery Road.</p> <p>There is no drawing of an access road to SP23 that informs the way movement occurs at and towards this site with a capacity of 200 houses.</p> <p>The former city engineer says that a roundabout 'should not have been built' in the current position at Galowstree Lane. Access for traffic access to SP23 is a major engineering undertaking due to the difference in height levels between Cemetery Road and Park Road and the downward sloping A525 towards Galowstree Lane, then sloping and curving route towards Cemetery Road.</p> <p>An attached plan was produced as a leaflet by the parish for residents to help uncover the overlapping ambitions for SP1 and SP23.</p> <p>The two sites adjoin, but no attempt has been made to create a single concept of 3 or 4 or 5 communities and this ambiguity is a serious weakness in terms of vehicular access in the proposals. The location of Silverdale primary Academy and the movement of children across Park Road to Newcastle Academy creates potential road safety issues to be incorporated in the design concept.</p> <p>Pedestrian access through Ashbourne Drive and Racecourse would both minimises the traffic disruption in Silverdale for residents in dozens of surrounding streets and alleviate road safety concerns.</p>
<b>Q7 Modification</b>	Consideration of pedestrian access from Ashbourne Drive and Racecourse.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I am familiar with this part of Newcastle under Lyme and regularly discuss planning issues with residents.
<b>Q10 File 1</b>	6386421
<b>Q10 File 2</b>	6386420
<b>Q10 File 3</b>	6386422
<b>Attachments</b>	<a href="#">SPC NUL Local Plan 2024 Leaflet FINAL.pdf</a> <a href="#">Access from Racecourse to SP11(4) and to SP23 along Park Road.docx</a> <a href="#">Access from Racecourse to SP11(4) and to SP23 along Park Road.docx (1)</a>
<b>Comment ID</b>	NULLP376
<b>Order</b>	31
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	PSD5 Green Belt
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The current level of protection for 40 hectares of woodland, pasture and grassland should not be removed from the greenbelt by sleight of hand.</p> <p>1 The proposed country park at Lyme Park within SP11-the former Keele Golf Course- is currently a mixture of woodland and grassland.</p> <p>2 The former site SP14, known as the cowfield. SP14 continues in agricultural use as pasture and contains a rectangle of environmentally sensitive land on the north west flank.</p> <p>3 The dense woodland at Job's Wood (identifiable on the 1900 OS map) contains regionally significant geology, a former sandstone quarry.</p> <p>4 There are sections of unidentified woodland across this area with connectivity to nature reserves and other wildlife habitats.</p> <p>5 The field pattern of 'Silverdale Farm', the precursor of the golf course is imprinted across sites SP11 and SP23 with the patchwork of hedgerows still in existence, also discernable from the 1900 OS map of Silverdale.</p> <p>The country park within SP11 and the site known as SP14 the Cowfield, bounded by SP23,Cemetery Road and the A525 should remain incorporated the greenbelt.</p> <p>The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals for the future on the greenbelt, the vista along the A525 and to the natural environment of Silverdale and Keele parishes.</p>



<b>Q7 Modification</b>	<p><b>Modification1:</b> The proposed country park within SP11 and the SP14 the Cowfield should remain incorporated the greenbelt.</p> <p>The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>The last major development in Silverdale completed in 2014 included 300 houses, a country park and Athletic club as part of a massive regeneration project on the huge Silverdale Colliery which ceased production in 1998.</p> <p>This 2024 Local Plan multiplies Heritage Park by a factor of 4.</p> <p>The impact of the proposed housing allocation at SP11 and SP23 on the community in Silverdale will be extraordinary and complex.</p> <p>Consider the photograph the landscape west across Silverdale from a drone hovering above the middle of SP23.</p> <p>The ground in 2040 below will consist of 2 new estates. SP23 200 houses and SP11 (4) 100 houses. The parkland beyond, about 75 hectares will consist of a further 800 houses. That total transformation requires much more in the way of preparation than provided in this document. It is so much more more than shifting a boundary line on a map by 1.8km.</p> <p>The two other maps indicate very thinly what the impact might be on the ground.</p> <p>Understanding this complexity is not easy. From many conversations with residents and officers of the council I would be able to explain the many concerns of residents both as an individual and as chair of the parish council.</p>
<b>Q10 File 1</b>	6386416
<b>Q10 File 2</b>	6386415
<b>Q10 File 3</b>	6386417
<b>Attachments</b>	<a href="#">Back Lane 27th March 2023 149.JPG</a> <a href="#">Former Municipal Golf Course taken from Local Plan Interactive Map 240824 (4).docx</a> <a href="#">109 Map drawn from Habitats Regulations Assessment Appendix 3 in the Cabinet report for 6 June 2023 (1).docx</a>
<b>Comment ID</b>	NULLP402
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy HOU2 c) Rural Centres
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Elsewhere in this document I have criticised the borough's Settlement Hierarchy for not considering the case of Silverdale for inclusion.</p> <p>Should the borough accept Silverdale as rural then the relevant density expectations should be significantly lower than proposed in Lime Park uploaded document..</p>
<b>Q7 Modification</b>	Revised statements for the density metrics appropriate in SP11 and SP23.
<b>Comment ID</b>	NULLP406
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11 SITE ARRANGMENT p172
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Silverdale Parish has objected to the proposed intensity of development and re-focus its criticism on the infrastructure by exploring grey areas arising from design of SP11 overlapping SP23 design.

	<p>Transport congestion problems in the High Street, Pepper St and B5044 were introduced at Ashbourne Drive and at Racecourse (with the pressure of a primary school location). There was acknowledgement of the improvements required, but these roads have extensive poor surface quality and narrow widths.</p> <p>Proposals as they stand will increase traffic flows through the centre of Silverdale and exacerbate movement problems at peak times. Additional concerns related to the possibility of rat runs through SP11 to and from Silverdale to the A525. It was noted a new spur was identified for A525 but the number of homes accessed from Silverdale will be about the same as accessed from Keele. How will the proposals change the road network from the Silverdale access points?</p> <p>The consistency of the treatment for SP23 alongside SP11 is uneven and is therefore questioned by the current presentation of the Local Plan. Rather than treating adjoining schemes independently in silos, there should be further steps to make the links more explicit.</p> <p>The impression given in the documentation is that issues in the design of SP11 are more important than SP23 to solve. This is a mistake that should be addressed.</p>
<b>Q7 Modification</b>	The promoter's master plan document for SP23 should be made publicly available prior to sign off by the council ahead of Planning Inspection.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I would like the opportunity of reading the masterplan for SP23 alongside SP11.
<b>Comment ID</b>	NULLP403
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Silverdale p169
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The statement '...forms part of the strategic centre' overlooks Silverdale's history. Despite the belief that it has been assimilated into the strategic centre, it is sufficiently self contained to be considered as a separate village.</p> <p>There is a separate physical geography still in existence as most of the Silverdale's boundaries are either green belts or green spaces and. Silverdale has rural neighbours, Keele, Audley and the more rural parts of Knutton, including farmland.</p>
<b>Q7 Modification</b>	Recognise in the Local Plan documentation the distinct history and geography of Silverdale Ward, the range of services delivered from the village and include references to the size of the transformation required by the largest single allocation of green belt release from the greenbelt.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I am passionate about Silverdale being presented in a positive light as a working community and as an independent entity from 'town'.

<b>Comment ID</b>	NULLP1278
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Silverdale Parish Council
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Introduction</p> <p>Regulation 19 consultation is the final point in the progress towards Planning Inspection, a public enquiry to consider whether the documentation is sound. This council consultation ends 7 October but ran parallel with government's 30 July planning reforms (ended on 24 September) focusing on growth of the national housing target, anticipating larger increases in housing for districts without a local plan in place, such as Newcastle.</p> <p>Officers and members are urging that the current 2024 plan is approved to avoid the district being held hostage by uncontrolled development that threaten the green belt and other areas, coupled with spectre of even higher numbers in a future revised Local Plan (appendix 3).</p> <p>Although future changes to National Planning Practice Framework (NPPF) will not be announced for many weeks, housing and infrastructure-led economic growth form the central plank of the Starmer government's national economic policy. Many of the previous government's planning policies are being reversed, including the re-introduction of mandatory housing targets and the proposed sharper methodology for assessing housing need at district level (based on stock numbers projected at 0.8 per cent annual increase and adjusted for relative housing affordability).</p> <p>National planning policy is fundamentally uncertain in the crucial period leading up to the completion of the Newcastle under Lyme documentation Final Local Plan.</p> <p>Key Points: Borough</p> <p>The main borough wide changes since the 2023 consultation are:</p> <p>An increase in the overall target for new housing to 400 per annum (total 8,000 over 20 years). An increased employment land provision and with it the inclusion of the Audley AB2 site and the housing demand component from this greater employment growth.</p> <p>The Local Plan excludes Silverdale from the 'rural centres' settlement hierarchy (PSD 2: Settlement Hierarchy Policy and PSD 3: Distribution of Development).</p> <p>The Rural Area Topic Paper puts certain rural villages in a stronger position for protection from the impact of new development. Our neighbour, Keele Parish is classified as rural. But the methodology takes no account of Silverdale Parish Council's rural/urban complexion. Silverdale is uniquely omitted from the list of Newcastle under Lyme's parishes. This parish is considered wholly urban and assimilated within the town without analysis in the Topic Paper.</p> <p>In terms of land use, more than half of Silverdale's 361 hectares is green belt, a fact not entertained in the Local Plan nor in the Topic Paper.</p> <p>Silverdale Key Points: (comparing consultations 2024 with 2023)</p> <p>Overall Development Strategy (PSD1)</p> <p>As mentioned earlier, PSD1 has a target of 400 per annum, which Silverdale Parish Council believes is too high.</p> <p>In addition, Silverdale's share of the 8,000 proposed new homes is 14 per cent compared with Silverdale's share of total population, which is 4 per cent. The proposed growth bears a disproportionate weight on this parish. 1,100 homes (some 2,200 people at the ratio of 1:2.2) equate to the size of four communities, each as large as Heritage Park.</p> <p>Silverdale PC accepts that some housing growth is needed to meet local housing needs and welcomes the two significant brownfield site allocations. It is the unprecedented scale of the change to the parish's physical and social structures that is our concern and how the increase in population would place far more pressure on health, education and other facilities and this one of the main concerns for many residents, who also question how the new facilities can be incorporated into the space populated by previous proposals.</p> <p>The provision of a safe and adequate access would be essential for all the allocated sites, including T&amp;G 8.</p> <p>Housing Site Allocations SP11, SP23 and T&amp;G 8</p> <p>Overall, loss of green belt land released from green belt at the former Golf Course and on land between Job's Wood and Park Road is unchanged. New boundaries are proposed at Redheath Plantation/Keele Driving Range on SP11 and at the Cemetery Road end of SP23. SP12 (Cope's Field) has been incorporated into SP11 within the Keele Country. The proposed loss of green belt at SP11 in 2024 is 69 hectares, marginally less than 2023.</p> <p>Additional proposals in 2024 cover a single-entry primary school, local centre/ health centre and a country park (Lime Park) with 4 new settlements. The published plans show vehicular access from Keele Rd via a spur into 3 parcels SP11 (1,2 and 3) and access from Ashbourne Drive to SP (1,2 and 3). Racecourse</p>

is the main access point to SP 11(4). Access to SP23 from Cemetery Road is another route but not clearly explained.

#### Gypsy and Traveller Allocation

Site T&G 8 allocated 5 pitches to land adjacent to Silverdale was a late inclusion into the Scrutiny Committee without proper consultation. See 4.2.

#### BDP Masterplan 27 August

Uploaded to the consultation portal as a late addition, Keele Park Masterplan arrived in the evidence basis as part of an objection to the Housing Policy Hou1 (see appendix 4). The report amounted to the landowner/promoter vision for the SP11 site with the consultants. It provides further grounds for SPC to make stronger representations concerning the infrastructure weaknesses in the proposals.

The inclusion of new community and educational facilities and the country park were welcomed but the house numbers at 1,100 were still an additional 40% increase in the size of Silverdale's stock of houses in 2021. Silverdale objects to the proposed intensity of development and re-focus its criticism on the infrastructure by exploring grey areas arising from design of SP11 overlapping SP23 design.

Transport congestion problems in the High Street, Pepper St and B5044 were introduced at Ashbourne Drive and at Racecourse (with the pressure of a primary school location). Members were dismayed there was no description of the improvements required to these poor surface quality local roads with narrow widths. Proposals as they stand will increase traffic flows through the centre of Silverdale and exacerbate movement problems at peak times. Additional concerns related to the possibility of rat runs through SP11 to and from Silverdale to A525. It was noted a new spur was identified for A525 but the number of homes accessed from Silverdale was the same as from Keele. The consistency of the treatment for SP23 alongside SP11 is questioned by the current presentation of the Local Plan.

BDP Lyme Park document, uploaded to the planning portal on 27 August indicated the rationale for SP11 yet the proposal for infrastructure did not address SP23 as clearly as SP11.

#### Silverdale's response

Silverdale Parish Council argues the current Local Plan is unsafe on specific planning policy grounds and then makes modifications as follows:

##### 1.Green Belt

The proposed Keele Park Development with the main land use as a country park is not sound because the current land use is parkland and it is illogical to remove the protection of 40 hectares of parkland from the greenbelt to provide 30 hectares of development as undesignated land. The decision to show parcels of land as circular spaces especially at SP11(3) does not permit a clear boundary between mixed housing development and parkland as is required. It is unclear how the range of density options will be utilised in the 4 distinct communities.

Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses.

The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.

Modification2: The former site SP14 should remain incorporated the greenbelt.

The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.

The proposed vehicular access to SP11 and SP23 suggests only minor improvements are required. No roundabouts. This is not a sound engineering proposition because, Silverdale's inner roads are all below A grade. The B5044 is the main surface providing through routes from the east to the west at Scot Hay and to the northwest A525. An additional route through the string of developments SP11 will have knock on effects to traffic in these principal routes.

##### Modification1:

Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.

##### Modification2:

Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.

##### 3.Relationship between new centres and existing centres

Silverdale has not been included as a rural parish and part of SP11 is contained in Keele which is designated as rural so that presents a classification problem for the borough council in the settlement hierarchy. The BDP report is not explicit how the new centre at SP11(2) and SP11(1) relates to Silverdale Local Centre.

Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.

A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.

##### 4. Housing Allocation

4.1 At 1,090 the total capacity, 1,100 houses remain unchanged, despite several new facilities and confining development with the introduction of new parcels (Local Plan p70).

The BDP consultant report (see Appendix 4) asserts that certain range of housing densities will prevail in the parcels at SP11 but the addition of more development mix other than residential into a smaller area entails density and site boundary considerations. Spaces for new facilities as well as housing density are not disaggregated from land allocated to the country park.

Modification: The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4. See also modification at SP23.

#### 4.2 Gypsy and Traveller Allocation 5 pitches

Site T&G 8 inclusion at Scrutiny Committee without any prior consultation with Silverdale Parish Council prior to the July 2024 Scrutiny Committee.

The decision is challengeable in the law because the land was acquired for the specific purpose of being kept as allotments. The previous change required Secretary of State's approval and the proposed change similarly requires Secretary of State's consent. The proposed use passes directly through the centre of a current statutory allotment site. Acre Allotments was recorded in the 1900 OS Map and in previous years, having been previously designated so for the use of Silverdale's citizens.

The decision is perverse, because

1 There is a long lease in place between the Borough Council and Silverdale Parish Council for the use of part of land, including the access road.

2 The proposed road access to T&G8 would be shared with Acre Allotment Association, sub tenants of Silverdale Parish Council. The proposed sharing of the road access could only occur if the road was improved to allow transport by vehicles pulling trailers. The necessary road improvement would be a necessary condition and coupled with new mains supplies for the pitches would threaten the continuation of the Allotment Association.

3 Extensive remediation is required where there is a history of unregulated deposit of different kinds of toxic waste harmful to human ranging from unremediated cattle and pig faeces to heavy metal contamination (from mining and waste accumulation) and also buried asbestos.

4 The development of this site would be unsustainable and environmentally harmful in another context. Northwest of the proposed access road is the Racecourse Community Woodland, between Mill Street and Park Street, containing many mature native trees and there are local springs which generate an ecology that would be harmed by the traffic and development proposed.

5 The single lane traffic access to the Acre Allotment Association is unsuitable. The access road is best classified as a country lane so the proposed development would fall foul of the policy of biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscape.

Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.

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The guidance re-imposed national housing targets for England and applied an increase of 21% in the target (from 305,000 to 370,000). However, the government also proposed to redistribute the highest target for London to the rest of England. The proposed guidance argues the average level of housing should be around 0.8 % per year.

#### 4 Extract from BDP Lime Park p41

The four neighbourhoods would be:

##### 1. Keele Square SP11(1)

A development of around 256 homes accessed from the existing roundabout on Keele Road. The neighbourhood is on gently sloping land and is planned around a landscape square which will also form a local centre.

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A development of 315 homes based on two points of access from Keele Road, one through the former golf clubhouse and the other through the driving range.

It may be that both are not required depending on ecology and other constraints, but it is useful to keep the two options. This neighbourhood is also based around a green space with arms of development extending along the former fairways retaining the backs of tree planting.

##### 3. Ashbourne Drive SP11(3)

This is proposed as a neighbourhood of 233 homes in the north-west part of the site, accessed from Ashbourne Drive. This scheme also has a village green and is planned to preserve the significant bank of trees running east to west through the site.

##### 4. Park Road SP11(4)

The final, slightly smaller neighbourhood of just under 100 homes is on Park Road.

This is physically separated from the rest of the site by a major bank of trees and would therefore feel like a very different place. The layout preserves the existing play area.

This layout allows the site to be marketed either as one scheme or as four different development parcels providing maximum flexibility. The scheme going forward would need to be subject to a Design Code that would create distinct identities for each of the neighbourhoods. The public realm would be retained for public use and to maximise biodiversity net gain.

<b>Q7 Modification</b>	<p>Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses.</p> <p>The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.</p> <p>Modification2: The former site SP14 should remain incorporated the greenbelt.</p> <p>The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.</p> <p>Modification1:</p> <p>Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.</p> <p>Modification2:</p> <p>Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.</p> <p>Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.</p> <p>A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.</p> <p>Modification: The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4. See also modification at SP23.</p> <p>Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p>
<b>Attachments</b>	<a href="#">1364586 Silverdale PC.jpg</a>
<b>Comment ID</b>	NULLP1277
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Silverdale Parish Council
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Introduction</p> <p>Regulation 19 consultation is the final point in the progress towards Planning Inspection, a public enquiry to consider whether the documentation is sound. This council consultation ends 7 October but ran parallel with government's 30 July planning reforms (ended on 24 September) focusing on growth of the national housing target, anticipating larger increases in housing for districts without a local plan in place, such as Newcastle.</p> <p>Officers and members are urging that the current 2024 plan is approved to avoid the district being held hostage by uncontrolled development that threaten the green belt and other areas, coupled with spectre of even higher numbers in a future revised Local Plan (appendix 3).</p> <p>Although future changes to National Planning Practice Framework (NPPF) will not be announced for many weeks, housing and infrastructure-led economic growth form the central plank of the Starmer government's national economic policy. Many of the previous government's planning policies are being reversed, including the re-introduction of mandatory housing targets and the proposed sharper methodology for assessing housing need at district level (based on stock numbers projected at 0.8 per cent annual increase and adjusted for relative housing affordability).</p> <p>National planning policy is fundamentally uncertain in the crucial period leading up to the completion of the Newcastle under Lyme documentation Final Local Plan.</p> <p>Key Points: Borough</p> <p>The main borough wide changes since the 2023 consultation are:</p> <p>An increase in the overall target for new housing to 400 per annum (total 8,000 over 20 years). An increased employment land provision and with it the inclusion of the Audley AB2 site and the housing demand component from this greater employment growth.</p> <p>The Local Plan excludes Silverdale from the 'rural centres' settlement hierarchy (PSD 2: Settlement Hierarchy Policy and PSD 3: Distribution of Development).</p> <p>The Rural Area Topic Paper puts certain rural villages in a stronger position for protection from the impact of new development. Our neighbour, Keele Parish is classified as rural. But the methodology takes no account of Silverdale Parish Council's rural/urban complexion. Silverdale is uniquely omitted from the</p>



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In terms of land use, more than half of Silverdale's 361 hectares is green belt, a fact not entertained in the Local Plan nor in the Topic Paper.

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As mentioned earlier, PSD1 has a target of 400 per annum, which Silverdale Parish Council believes is too high.

In addition, Silverdale's share of the 8,000 proposed new homes is 14 per cent compared with Silverdale's share of total population, which is 4 per cent. The proposed growth bears a disproportionate weight on this parish. 1,100 homes (some 2,200 people at the ratio of 1:2.2) equate to the size of four communities, each as large as Heritage Park.

Silverdale PC accepts that some housing growth is needed to meet local housing needs and welcomes the two significant brownfield site allocations. It is the unprecedented scale of the change to the parish's physical and social structures that is our concern and how the increase in population would place far more pressure on health, education and other facilities and this one of the main concerns for many residents, who also question how the new facilities can be incorporated into the space populated by previous proposals.

The provision of a safe and adequate access would be essential for all the allocated sites, including T&G 8.

Housing Site Allocations SP11, SP23 and T&G 8

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Additional proposals in 2024 cover a single-entry primary school, local centre/ health centre and a country park (Lime Park) with 4 new settlements. The published plans show vehicular access from Keele Rd via a spur into 3 parcels SP11 (1,2 and 3) and access from Ashbourne Drive to SP (1,2 and 3). Racecourse is the main access point to SP 11(4). Access to SP23 from Cemetery Road is another route but not clearly explained.

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Transport congestion problems in the High Street, Pepper St and B5044 were introduced at Ashbourne Drive and at Racecourse (with the pressure of a primary school location). Members were dismayed there was no description of the improvements required to these poor surface quality local roads with narrow widths. Proposals as they stand will increase traffic flows through the centre of Silverdale and exacerbate movement problems at peak times. Additional concerns related to the possibility of rat runs through SP11 to and from Silverdale to A525. It was noted a new spur was identified for A525 but the number of homes accessed from Silverdale was the same as from Keele. The consistency of the treatment for SP23 alongside SP11 is questioned by the current presentation of the Local Plan.

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Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses.

The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.

Modification2: The former site SP14 should remain incorporated the greenbelt.

The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.

The proposed vehicular access to SP11 and SP23 suggests only minor improvements are required. No roundabouts. This is not a sound engineering proposition because, Silverdale's inner roads are all below A grade. The B5044 is the main surface providing through routes from the east to the west at Scot Hay

and to the northwest A525. An additional route through the string of developments SP11 will have knock on effects to traffic in these principal routes.

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Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.

#### 3.Relationship between new centres and existing centres

Silverdale has not been included as a rural parish and part of SP11 is contained in Keele which is designated as rural so that presents a classification problem for the borough council in the settlement hierarchy. The BDP report is not explicit how the new centre at SP11(2) and SP11(1) relates to Silverdale Local Centre.

Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.

A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.

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4.1 At 1,090 the total capacity, 1,100 houses remain unchanged, despite several new facilities and confining development with the introduction of new parcels (Local Plan p70).

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Site T&G 8 inclusion at Scrutiny Committee without any prior consultation with Silverdale Parish Council prior to the July 2024 Scrutiny Committee.

The decision is challengeable in the law because the land was acquired for the specific purpose of being kept as allotments. The previous change required Secretary of State's approval and the proposed change similarly requires Secretary of State's consent. The proposed use passes directly through the centre of a current statutory allotment site. Acre Allotments was recorded in the 1900 OS Map and in previous years, having been previously designated so for the use of Silverdale's citizens.

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<b>Attachments</b>	<a href="#">1364586 Silverdale PC.jpg</a>
<b>Comment ID</b>	NULLP1276
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Silverdale Parish Council
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1

## Q6 Details

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1 There is a long lease in place between the Borough Council and Silverdale Parish Council for the use of part of land, including the access road.

2 The proposed road access to T&G8 would be shared with Acre Allotment Association, sub tenants of Silverdale Parish Council. The proposed sharing of the road access could only occur if the road was



	<p>improved to allow transport by vehicles pulling trailers. The necessary road improvement would be a necessary condition and coupled with new mains supplies for the pitches would threaten the continuation of the Allotment Association.</p> <p>3 Extensive remediation is required where there is a history of unregulated deposit of different kinds of toxic waste harmful to human ranging from unremediated cattle and pig faeces to heavy metal contamination (from mining and waste accumulation) and also buried asbestos.</p> <p>4 The development of this site would be unsustainable and environmentally harmful in another context. Northwest of the proposed access road is the Racecourse Community Woodland, between Mill Street and Park Street, containing many mature native trees and there are local springs which generate an ecology that would be harmed by the traffic and development proposed.</p> <p>5 The single lane traffic access to the Acre Allotment Association is unsuitable. The access road is best classified as a country lane so the proposed development would fall foul of the policy of biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscape.</p> <p>Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p> <p>Appendices</p> <p>1. Audley Parish Council have commented through their consultant on 3 October 2024 that a mistake may have occurred in the classification as a district centre.</p> <p>Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.</p> <p>2. There has been an active Facebook group, PAPG operating to gather support and organised a workshop in September to help guide residents through the documentation.</p> <p>3. Based on Proposed Draft 2024 NPPF giving Newcastle a higher Minimum Housing Need Target at 593 set against the current 400.</p> <p>The guidance re-imposed national housing targets for England and applied an increase of 21% in the target (from 305,000 to 370,000). However, the government also proposed to redistribute the highest target for London to the rest of England. The proposed guidance argues the average level of housing should be around 0.8 % per year.</p> <p>4 Extract from BDP Lime Park p41 The four neighbourhoods would be:</p> <p>1. Keele Square SP11(1) A development of around 256 homes accessed from the existing roundabout on Keele Road. The neighbourhood is on gently sloping land and is planned around a landscape square which will also form a local centre.</p> <p>2. Keele Woods SP11(2) A development of 315 homes based on two points of access from Keele Road, one through the former golf clubhouse and the other through the driving range. It may be that both are not required depending on ecology and other constraints, but it is useful to keep the two options. This neighbourhood is also based around a green space with arms of development extending along the former fairways retaining the backs of tree planting.</p> <p>3. Ashbourne Drive SP11(3) This is proposed as a neighbourhood of 233 homes in the north-west part of the site, accessed from Ashbourne Drive. This scheme also has a village green and is planned to preserve the significant bank of trees running east to west through the site.</p> <p>4. Park Road SP11(4) The final, slightly smaller neighbourhood of just under 100 homes is on Park Road. This is physically separated from the rest of the site by a major bank of trees and would therefore feel like a very different place. The layout preserves the existing play area. This layout allows the site to be marketed either as one scheme or as four different development parcels providing maximum flexibility. The scheme going forward would need to be subject to a Design Code that would create distinct identities for each of the neighbourhoods. The public realm would be retained for public use and to maximise biodiversity net gain.</p>
<b>Q7 Modification</b>	<p>Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses. The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.</p> <p>Modification2: The former site SP14 should remain incorporated in the greenbelt. The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.</p> <p>Modification1: Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.</p> <p>Modification2: Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.</p> <p>Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.</p>



	<p>A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.</p> <p>Modification: The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4. See also modification at SP23.</p> <p>Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p>
<b>Attachments</b>	<a href="#">1364586 Silverdale PC.jpg</a>
<b>Comment ID</b>	NULLP1279
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Company / Organisation</b>	Silverdale Parish Council
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Adamczuk
<b>Consultee Given Name</b>	Henryk
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Introduction</p> <p>Regulation 19 consultation is the final point in the progress towards Planning Inspection, a public enquiry to consider whether the documentation is sound. This council consultation ends 7 October but ran parallel with government's 30 July planning reforms (ended on 24 September) focusing on growth of the national housing target, anticipating larger increases in housing for districts without a local plan in place, such as Newcastle.</p> <p>Officers and members are urging that the current 2024 plan is approved to avoid the district being held hostage by uncontrolled development that threaten the green belt and other areas, coupled with spectre of even higher numbers in a future revised Local Plan (appendix 3).</p> <p>Although future changes to National Planning Practice Framework (NPPF) will not be announced for many weeks, housing and infrastructure-led economic growth form the central plank of the Starmer government's national economic policy. Many of the previous government's planning policies are being reversed, including the re-introduction of mandatory housing targets and the proposed sharper methodology for assessing housing need at district level (based on stock numbers projected at 0.8 per cent annual increase and adjusted for relative housing affordability).</p> <p>National planning policy is fundamentally uncertain in the crucial period leading up to the completion of the Newcastle under Lyme documentation Final Local Plan.</p> <p>Key Points: Borough</p> <p>The main borough wide changes since the 2023 consultation are:</p> <p>An increase in the overall target for new housing to 400 per annum (total 8,000 over 20 years). An increased employment land provision and with it the inclusion of the Audley AB2 site and the housing demand component from this greater employment growth.</p> <p>The Local Plan excludes Silverdale from the 'rural centres' settlement hierarchy (PSD 2: Settlement Hierarchy Policy and PSD 3: Distribution of Development).</p> <p>The Rural Area Topic Paper puts certain rural villages in a stronger position for protection from the impact of new development. Our neighbour, Keele Parish is classified as rural. But the methodology takes no account of Silverdale Parish Council's rural/urban complexion. Silverdale is uniquely omitted from the list of Newcastle under Lyme's parishes. This parish is considered wholly urban and assimilated within the town without analysis in the Topic Paper.</p> <p>In terms of land use, more than half of Silverdale's 361 hectares is green belt, a fact not entertained in the Local Plan nor in the Topic Paper.</p> <p>Silverdale Key Points: (comparing consultations 2024 with 2023)</p> <p>Overall Development Strategy (PSD1)</p> <p>As mentioned earlier, PSD1 has a target of 400 per annum, which Silverdale Parish Council believes is too high.</p> <p>In addition, Silverdale's share of the 8,000 proposed new homes is 14 per cent compared with Silverdale's share of total population, which is 4 per cent. The proposed growth bears a disproportionate weight on this parish. 1,100 homes (some 2,200 people at the ratio of 1:2.2) equate to the size of four communities, each as large as Heritage Park.</p> <p>Silverdale PC accepts that some housing growth is needed to meet local housing needs and welcomes the two significant brownfield site allocations. It is the unprecedented scale of the change to the parish's physical and social structures that is our concern and how the increase in population would place far more pressure on health, education and other facilities and this one of the main concerns for many</p>

residents, who also question how the new facilities can be incorporated into the space populated by previous proposals.

The provision of a safe and adequate access would be essential for all the allocated sites, including T&G 8.

Housing Site Allocations SP11, SP23 and T&G 8

Overall, loss of green belt land released from green belt at the former Golf Course and on land between Job's Wood and Park Road is unchanged. New boundaries are proposed at Redheath Plantation/Keele Driving Range on SP11 and at the Cemetery Road end of SP23. SP12 (Cope's Field) has been incorporated into SP11 within the Keele Country. The proposed loss of green belt at SP11 in 2024 is 69 hectares, marginally less than 2023.

Additional proposals in 2024 cover a single-entry primary school, local centre/ health centre and a country park (Lime Park) with 4 new settlements. The published plans show vehicular access from Keele Rd via a spur into 3 parcels SP11 (1,2 and 3) and access from Ashbourne Drive to SP (1,2 and 3). Racecourse is the main access point to SP 11(4). Access to SP23 from Cemetery Road is another route but not clearly explained.

Gypsy and Traveller Allocation

Site T&G 8 allocated 5 pitches to land adjacent to Silverdale was a late inclusion into the Scrutiny Committee without proper consultation. See 4.2.

BDP Masterplan 27 August

Uploaded to the consultation portal as a late addition, Keele Park Masterplan arrived in the evidence basis as part of an objection to the Housing Policy Hou1 (see appendix 4). The report amounted to the landowner/promoter vision for the SP11 site with the consultants. It provides further grounds for SPC to make stronger representations concerning the infrastructure weaknesses in the proposals.

The inclusion of new community and educational facilities and the country park were welcomed but the house numbers at 1,100 were still an additional 40% increase in the size of Silverdale's stock of houses in 2021. Silverdale objects to the proposed intensity of development and re-focus its criticism on the infrastructure by exploring grey areas arising from design of SP11 overlapping SP23 design.

Transport congestion problems in the High Street, Pepper St and B5044 were introduced at Ashbourne Drive and at Racecourse (with the pressure of a primary school location). Members were dismayed there was no description of the improvements required to these poor surface quality local roads with narrow widths. Proposals as they stand will increase traffic flows through the centre of Silverdale and exacerbate movement problems at peak times. Additional concerns related to the possibility of rat runs through SP11 to and from Silverdale to A525. It was noted a new spur was identified for A525 but the number of homes accessed from Silverdale was the same as from Keele. The consistency of the treatment for SP23 alongside SP11 is questioned by the current presentation of the Local Plan.

BDP Lyme Park document, uploaded to the planning portal on 27 August indicated the rationale for SP11 yet the proposal for infrastructure did not address SP23 as clearly as SP11.

Silverdale's response

Silverdale Parish Council argues the current Local Plan is unsafe on specific planning policy grounds and then makes modifications as follows:

#### 1.Green Belt

The proposed Keele Park Development with the main land use as a country park is not sound because the current land use is parkland and it is illogical to remove the protection of 40 hectares of parkland from the greenbelt to provide 30 hectares of development as undesignated land. The decision to show parcels of land as circular spaces especially at SP11(3) does not permit a clear boundary between mixed housing development and parkland as is required. It is unclear how the range of density options will be utilised in the 4 distinct communities.

Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses.

The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.

Modification2: The former site SP14 should remain incorporated the greenbelt.

The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.

The proposed vehicular access to SP11 and SP23 suggests only minor improvements are required. No roundabouts. This is not a sound engineering proposition because, Silverdale's inner roads are all below A grade. The B5044 is the main surface providing through routes from the east to the west at Scot Hay and to the northwest A525. An additional route through the string of developments SP11 will have knock on effects to traffic in these principal routes.

Modification1:

Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.

Modification2:

Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.

#### 3.Relationship between new centres and existing centres

Silverdale has not been included as a rural parish and part of SP11 is contained in Keele which is designated as rural so that presents a classification problem for the borough council in the settlement hierarchy. The BDP report is not explicit how the new centre at SP11(2) and SP11(1) relates to Silverdale Local Centre.

Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.

A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.

#### 4. Housing Allocation

4.1 At 1,090 the total capacity, 1,100 houses remain unchanged, despite several new facilities and confining development with the introduction of new parcels (Local Plan p70).

The BDP consultant report (see Appendix 4) asserts that certain range of housing densities will prevail in the parcels at SP11 but the addition of more development mix other than residential into a smaller area entails density and site boundary considerations. Spaces for new facilities as well as housing density are not disaggregated from land allocated to the country park.

Modification: The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4. See also modification at SP23.

#### 4.2 Gypsy and Traveller Allocation 5 pitches

Site T&G 8 inclusion at Scrutiny Committee without any prior consultation with Silverdale Parish Council prior to the July 2024 Scrutiny Committee.

The decision is challengeable in the law because the land was acquired for the specific purpose of being kept as allotments. The previous change required Secretary of State's approval and the proposed change similarly requires Secretary of State's consent. The proposed use passes directly through the centre of a current statutory allotment site. Acre Allotments was recorded in the 1900 OS Map and in previous years, having been previously designated so for the use of Silverdale's citizens.

The decision is perverse, because

1 There is a long lease in place between the Borough Council and Silverdale Parish Council for the use of part of land, including the access road.

2 The proposed road access to T&G8 would be shared with Acre Allotment Association, sub tenants of Silverdale Parish Council. The proposed sharing of the road access could only occur if the road was improved to allow transport by vehicles pulling trailers. The necessary road improvement would be a necessary condition and coupled with new mains supplies for the pitches would threaten the continuation of the Allotment Association.

3 Extensive remediation is required where there is a history of unregulated deposit of different kinds of toxic waste harmful to human ranging from unremediated cattle and pig faeces to heavy metal contamination (from mining and waste accumulation) and also buried asbestos.

4 The development of this site would be unsustainable and environmentally harmful in another context. Northwest of the proposed access road is the Racecourse Community Woodland, between Mill Street and Park Street, containing many mature native trees and there are local springs which generate an ecology that would be harmed by the traffic and development proposed.

5 The single lane traffic access to the Acre Allotment Association is unsuitable. The access road is best classified as a country lane so the proposed development would fall foul of the policy of biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscape.

Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.

#### Appendices

1. Audley Parish Council have commented through their consultant on 3 October 2024 that a mistake may have occurred in the classification as a district centre.

Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.

2. There has been an active Facebook group, PAPG operating to gather support and organised a workshop in September to help guide residents through the documentation.

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The guidance re-imposed national housing targets for England and applied an increase of 21% in the target (from 305,000 to 370,000). However, the government also proposed to redistribute the highest target for London to the rest of England. The proposed guidance argues the average level of housing should be around 0.8 % per year.

#### 4 Extract from BDP Lime Park p41

The four neighbourhoods would be:

##### 1. Keele Square SP11(1)

A development of around 256 homes accessed from the existing roundabout on Keele Road. The neighbourhood is on gently sloping land and is planned around a landscape square which will also form a local centre.

##### 2. Keele Woods SP11(2)

A development of 315 homes based on two points of access from Keele Road, one through the former golf clubhouse and the other through the driving range.

	<p>It may be that both are not required depending on ecology and other constraints, but it is useful to keep the two options. This neighbourhood is also based around a green space with arms of development extending along the former fairways retaining the backs of tree planting.</p> <p>3. Ashbourne Drive SP11(3) This is proposed as a neighbourhood of 233 homes in the north-west part of the site, accessed from Ashbourne Drive. This scheme also has a village green and is planned to preserve the significant bank of trees running east to west through the site.</p> <p>4. Park Road SP11(4) The final, slightly smaller neighbourhood of just under 100 homes is on Park Road. This is physically separated from the rest of the site by a major bank of trees and would therefore feel like a very different place. The layout preserves the existing play area. This layout allows the site to be marketed either as one scheme or as four different development parcels providing maximum flexibility. The scheme going forward would need to be subject to a Design Code that would create distinct identities for each of the neighbourhoods. The public realm would be retained for public use and to maximise biodiversity net gain.</p>
<b>Q7 Modification</b>	<p>Modification1: The country park should remain incorporated in the greenbelt and the boundaries should be regularised showing distinction between land uses. The proposed new boundary for SP23 and the former site SP14 also known as The Cowfield is proposed as an open space so the same argument can be applied.</p> <p>Modification2: The former site SP14 should remain incorporated the greenbelt. The net effect of the modifications would protect up to 45 hectares of open space currently within the greenbelt and thereby reduce the harm of the development proposals on the greenbelt.</p> <p>Modification1: Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.</p> <p>Modification2: Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525.</p> <p>Modification: Silverdale Parish Council considers itself a village under the following definition and a claim to be a rural parish should be at least recognised and explored within the Settlement Hierarchy Methodology.</p> <p>A village in the UK is a compact settlement of houses, smaller in size than a town, and generally based on agriculture or, in some areas, mining (such as Ouston, County Durham), quarrying or sea fishing. In addition, given SP11 includes land in Keele Parish, which is rural. Then part of that site lies within a rural parish. The methodology adopted in the Rural Topic Paper (2024) does not address boundary issues where a housing allocation covers two adjoining parishes.</p> <p>Modification: The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4. See also modification at SP23.</p> <p>Modification: The proposal should be excluded from the Allocation of Gypsy and Traveller Sites or as an alternative an access from Maries Way could avoid the conflict with the natural environment at the Acres and at Racecourse Community Woodland but that option must involve a full physical survey of the area to identify contaminants followed by remediation.</p>
<b>Attachments</b>	<a href="#">1364586 Silverdale PC.jpg</a>

<b>Comment ID</b>	NULLP1290
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Adams
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I object to the the following planning: AB12, AB2, AB15 and AB33</p> <ol style="list-style-type: none"> <li>1 NuLBC are applying a high growth strategy. They present no evidence that this will transpire. In the village of audley and surrounds there are small pockets of land that are being developed appropriately and proportionately to the surrounds. Larger scale housing is not required, therefore I feel this is unjustified and unsound.</li> <li>2 AB2: NuLBC say they require 22 Ha of strategic employment land. However, they are allocating 80 Ha at the AB2 site alone. This is not justified therefore not sound. There are already huge warehousing within our vicinity, some laying empty and some already under development. There is no evidence to suggest this building is required.</li> <li>3 AB2: The already high levels of traffic at junction16 of the M6 and the surrounding villages means that the junction will require a major upgrade. The required funding from Highways England is unlikely to be forthcoming due to the £22 billion shortfall in the nations finances. This is not deliverable before the end of the local plan period (2040), therefore it is ineffective hence unsound. To add to this the A500 is already at capacity meaning that increased traffic would be detrimental to our local community. It's obscene to think that all increased traffic won't result in increased traffic on our rural roads. These roads being predominantly terraced streets, when built were not designed for multi car occupants or heavy traffic. Please do view in particular ravens lane and new road.</li> </ol> <p>1 All allocations in the Audley and Bignall End area for housing are in the green belt.</p> <p>Moreover, as proposed developments they would increase traffic flow well beyond the capacity of the current road system as well as placing added pressure on local schools and GP's surgeries etc. These allocations are therefore not justified, hence unsound.</p> <p>I would further like to add a personal note. Being a mother (REDACTED BY OFFICERS), I want to stress the importance of our community here, our children "go outside to play" these green spaces are invaluable. At a time where mental health in young people is a pandemic problem let's not allow this to happen to our children, who won't be children forever. We want everyone to enjoy this wonderful village, this generation and many more to come. The wildlife in our village is amazing, from owls and bats to badgers and hedgehogs. We WANT to keep it this way. Trees are natures carbon catchers, it is vital that these green belt areas are protected and cherished. Staffordshire County council should be utilising brown field sites over green belt.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove these allocations from the local plan.

<b>Comment ID</b>	NULLP1292
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Adams
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I object to the the following planning: AB12, AB2, AB15 and AB33</p> <ol style="list-style-type: none"> <li>1 NuLBC are applying a high growth strategy. They present no evidence that this will transpire. In the village of audley and surrounds there are small pockets of land that are being developed appropriately and proportionately to the surrounds. Larger scale housing is not required, therefore I feel this is unjustified and unsound.</li> <li>1 AB12 represents a high quality contribution to the green belt. Building 125 homes here would exacerbate flooding into the nearby Brierley Brook. This would take away climate mitigation and contributions to our food security, not just from this site but also from neighbouring fields that will be affected by flooding. This site is therefore not justified and consequently unsound.</li> </ol>



	<p>2 AB15 (33 dwellings) and AB33 (55 dwellings): Similar arguments to item 5 above can be applied to these allocations also. Therefore, these allocations are similarly unsound.</p> <p>3 All allocations in the Audley and Bignall End area for housing are in the green belt.</p> <p>Moreover, as proposed developments they would increase traffic flow well beyond the capacity of the current road system as well as placing added pressure on local schools and GP's surgeries etc. These allocations are therefore not justified, hence unsound.</p> <p>I would further like to add a personal note. Being a mother (REDACTED BY OFFICERS), I want to stress the importance of our community here, our children "go outside to play" these green spaces are invaluable. At a time where mental health in young people is a pandemic problem let's not allow this to happen to our children, who won't be children forever. We want everyone to enjoy this wonderful village, this generation and many more to come. The wildlife in our village is amazing, from owls and bats to badgers and hedgehogs. We WANT to keep it this way. Trees are nature's carbon catchers, it is vital that these green belt areas are protected and cherished. Staffordshire County council should be utilising brown field sites over green belt.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove these allocations from the local plan.
<b>Comment ID</b>	NULLP1293
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Adams
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I object to the the following planning: AB12, AB2, AB15 and AB33</p> <p>1 NuLBC are applying a high growth strategy. They present no evidence that this will transpire. In the village of audley and surrounds there are small pockets of land that are being developed appropriately and proportionately to the surrounds. Larger scale housing is not required, therefore I feel this is unjustified and unsound.</p> <p>1 AB12 represents a high quality contribution to the green belt. Building 125 homes here would exacerbate flooding into the nearby Brierley Brook. This would take away climate mitigation and contributions to our food security, not just from this site but also from neighbouring fields that will be affected by flooding. This site is therefore not justified and consequently unsound.</p> <p>2 AB15 (33 dwellings) and AB33 (55 dwellings): Similar arguments to item 5 above can be applied to these allocations also. Therefore, these allocations are similarly unsound.</p> <p>3 All allocations in the Audley and Bignall End area for housing are in the green belt.</p> <p>Moreover, as proposed developments they would increase traffic flow well beyond the capacity of the current road system as well as placing added pressure on local schools and GP's surgeries etc. These allocations are therefore not justified, hence unsound.</p> <p>I would further like to add a personal note. Being a mother (REDACTED BY OFFICERS), I want to stress the importance of our community here, our children "go outside to play" these green spaces are invaluable. At a time where mental health in young people is a pandemic problem let's not allow this to happen to our children, who won't be children forever. We want everyone to enjoy this wonderful village, this generation and many more to come. The wildlife in our village is amazing, from owls and bats to badgers and hedgehogs. We WANT to keep it this way. Trees are nature's carbon catchers, it is vital that these green belt areas are protected and cherished. Staffordshire County council should be utilising brown field sites over green belt.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove these allocations from the local plan.
<b>Comment ID</b>	NULLP1291
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Adams
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I object to the the following planning: AB12, AB2, AB15 and AB33</p>

	<p>1. NuLBC are applying a high growth strategy. They present no evidence that this will transpire. In the village of audley and surrounds there are small pockets of land that are being developed appropriately and proportionately to the surrounds. Larger scale housing is not required, therefore I feel this is unjustified and unsound.</p> <p>1 AB12 (125 dwellings): This site has very limited accessibility. Proposed access points are at the bottom of Diglake Street and via the track adjacent to 104 Raven's Lane. These points are too narrow for long term access, especially given that local roads are beyond capacity at peak times. This is not deliverable making it ineffective. Therefore, it is unsound. Planning for this site proposes a car park which would not be appropriate of the residents who live here, particularly the elderly and disabled.</p> <p>2 AB12 represents a high quality contribution to the green belt. Building 125 homes here would exacerbate flooding into the nearby Brierley Brook. This would take away climate mitigation and contributions to our food security, not just from this site but also from neighbouring fields that will be affected by flooding. This site is therefore not justified and consequently unsound.</p> <p>1 All allocations in the Audley and Bignall End area for housing are in the green belt.</p> <p>Moreover, as proposed developments they would increase traffic flow well beyond the capacity of the current road system as well as placing added pressure on local schools and GP's surgeries etc. These allocations are therefore not justified, hence unsound.</p> <p>I would further like to add a personal note. Being a mother (REDACTED BY OFFICERS), I want to stress the importance of our community here, our children "go outside to play" these green spaces are invaluable. At a time where mental health in young people is a pandemic problem let's not allow this to happen to our children, who won't be children forever. We want everyone to enjoy this wonderful village, this generation and many more to come. The wildlife in our village is amazing, from owls and bats to badgers and hedgehogs. We WANT to keep it this way. Trees are nature's carbon catchers, it is vital that these green belt areas are protected and cherished. Staffordshire County council should be utilising brown field sites over green belt.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove these allocations from the local plan

<b>Comment ID</b>	NULLP378
<b>Order</b>	48
<b>Title</b>	Policy HOU4: Gypsy, Travellers and Travelling Showpeople
<b>Consultee Family Name</b>	Adcock
<b>Consultee Given Name</b>	Rupert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU4
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>G&amp;T Site 8 may not be suitable for gypsy and traveller pitches for the following reasons.</p> <p>The Acres allotment site has existed since the late 19th Century was run by Borough Council until 2015 when it was passed to the Silverdale Parish Council and the Acres Allotment association. In 2021 they applied to the council and were granted permission for the land outlined in G&amp;T 8 to be taken over as additional allotment land. However the land was never cleared by the council as agreed so was unable to be used for allotments.</p> <p>There is concern that the site was used to dump both buried asbestos sheeting (Chrysolite asbestos) and also used oil from the garage site on Cemetery Road.</p> <p>The site may be unsuitable for housing gypsies and travellers because of unsuitable access along footpath 22. The land is controlled by Staffordshire County Council as is not wide enough for many vehicles including service vehicles, refuse wagons and caravans. The path would have to be widened and strengthened and would involve taking away designated allotment land.</p> <p>This was a late addition into the local plan and there was little consultation with the allotment holders beforehand. Whilst they do not object to this land being used, it is believed the above issues need to be addressed before this land can be included in any housing policy.</p>
<b>Q7 Modification</b>	<p>Concerning G&amp;T Site 8</p> <p>Clarification needed over whether or not this land is designated allotment land.</p> <p>Site inspection to confirm whether land is contaminated with buried asbestos before being deemed suitable.</p> <p>Access provisions to be reviewed to ensure this is a suitable access for vehicles to support gypsy pitches given the narrow and difficult access to the site. Alternative access arrangements to be explored.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP379
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Adcock
<b>Consultee Given Name</b>	Rupert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The Local Plan housing allocations are sound. In my area of Silverdale they have responded to residents views and modified the allocation map and split SP11 development of the former golf course site into smaller parcels. This has maintained the housing target number but also allowed for the provision of a new Country Park to support residents wellbeing and preserve green spaces, ancient trees and water bodies in the area. The addition of a new primary school and health centre into the plans shows greater consideration of the infrastructure demands of new housing.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP258
<b>Order</b>	206
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Albinson
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Paragraph 13.172... The old golf course is the greenest of greenbelt, and should NEVER be developed. It is of much greater value to the people of Newcastle-u-lyme as a large green quiet open space than it will ever be as housing. The idea that you can "enhance" the left over half of the space which will have a thousand houses, and maybe 2-3000 extra people with all the extra footfall, is twaddle. It will rapidly resemble the well worn out green spaces near and in town which need a great deal of (expensive) human care to maintain in anything more than a small sea of brown and grassy mud.</p> <p>The whole plan to develop the old golf course is wretchedly UNSOUND.</p>
<b>Q7 Modification</b>	Do NOT build on the old golf course. Revisit repurposing office and factory spaces for housing.
<b>Comment ID</b>	NULLP256
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Albinson
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Paragraph 13.172 - This is self-evidently contradictory. The current area is a large grassed/treed expanse, big enough to absorb the human foot traffic imposed on it. Adding the best part of 1000 houses, circa 2-3000 people will wear down this area rapidly to resemble the worn out green-ish spaces closer to town. To speak of enhancing the area under this degree of footfall is twaddle.</p>
<b>Q7 Modification</b>	To respect the soundness of this local plan, the fact that this is the greenest of green belt should be acknowledged, and should NEVER be developed.
<b>Comment ID</b>	NULLP257
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Albinson
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Paragraph 13
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>From Memory, circa 1989-1990 the field adjacent to this site, SP11 in fact but geologically the same, was bulldozed to form a level playing field. This backfired in that the hillside, previously just adequately drained, became a swamp. It has NEVER dried out, and grows a fine bunch of rushes to this day.</p> <p>Without very expensive field drains, which will push the cost of the proposed houses way up, the hapless inhabitants will live inside a series of swamplets. In addition, a changing climate, a warmer, wetter, world, subject to more cloudbursts, implies an increased risk of major mudslides during construction. The example of the Gulval (nr Penzance) 18 August 2006 mudslide, where a ploughed field above the village post a cloudburst caused a lot of damage as it smashed through and downhill should be kept in mind.</p>

<b>Comment ID</b>	NULLP264
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Alcock
<b>Consultee Given Name</b>	Bob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site G&T 8
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I am a tenant on Plot 9 of the ACRE Allotments and the proposed access is via the main gate for our Allotments and as such if the Transient Traveler Site is agreed would mean both the gates and the posts being removed to allow 24 hour access.</p> <p>What provisions would be made for site security in respect of our Allotments ?</p> <p>The road access is too uneven and narrow for our vehicles and we do not tow caravans.</p> <p>Am I in danger of losing some of my land to accommodate the track to be widened ?</p> <p>If there are only 5 proposed pitches on this site, what would happen if all of these pitches are occupied and more arrive ?</p> <p>What would stop them from parking on our allocated car park area ?</p> <p>What would happen to the Public Right of Way - Footpath No 22 ?</p> <p>Are the Borough Council aware that the proposed site is situated on land contaminated by buried asbestos and used oil from previous business waste disposal ?</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP350
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Allen
<b>Consultee Given Name</b>	Martin
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Policy AB12 Land East of Diglake Street - paragraph 2, 3 & 12
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Proposed entry/exit off Diglake Street would cause both Albert Street &amp; Diglake Street to be the thoroughfare for est. 200-220 additional vehicles.</p> <p>Access to the site would be extremely restrictive, even when factoring in the provision of parking for existing residents of Diglake Street. Road is narrow. Proposed access to the new development is also awkward. Road is quite elevated compared to the field, and it would be a tight corner turning in whether coming from Diglake Street, or Albert Street.</p> <p>With regards to the proposed parking, I don't think the existing residents would be happy.</p> <p>Eg. residents at No. 4 &amp; 6 Diglake street, who currently park outside their homes would be required to park roughly 180m away from their property. I don't think this is fair, so may fall foul of Duty to Co-operate.</p> <p>As this would be single entry/exit to est 120 homes, new residents in the furthest corner of the proposed new estate would be 400m as a straight line from the exit. This may fall foul of being Sound in design for a new development.</p> <p>Entry to the development would also have to factor in emergency vehicles which I believe would be problematic with Diglake Street/Albert Street. Junction for Albert Street is already unusual, and vehicles manoeuvring into Albert Street from Ravens Lane already have to cross Chapel Street. Visibility to the left looking down Chapel Street is restricted when turning in, and drivers already have to be very cautious. This may fall foul of being Legally compliant.</p> <p>Proposed alternative entrance off Ravens Lane would also be problematic. This would require compulsory purchase of 1 or more properties. However the corner on Ravens is already a pinch-point for traffic heading east due to parked cars all the way up Ravens Lane, restricting visibility of oncoming traffic, and traffic frequently pausing to allow passing of vehicles. Adding a junction here for 200 additional vehicles would cause further a bottle-neck and could be hazardous. This may fall foul of being Legally compliant.</p> <p>With regards to improvements in the capacity of local schools, Ravensmead Primary School and Pear Tree Nursery are the only schools within the surrounding areas, and are already at capacity. There doesn't seem to be any provisions on the Local Plan to physically extend the schools. Fields directly behind Ravensmead are not a part of AB12.</p> <p>There is no land for Pear Tree to extend as this is on the corner of Ravens Lane/Chapel Street.</p> <p>One of the "lollipop-crossings" on Ravens Lane for the pupils walking to the schools is currently near the Ravens Lane/Chapel Street/Albert Street junction. Increased traffic around rush-hour due to the proposed development would be hazardous to the children walking to school.</p>
<b>Q7 Modification</b>	Removal of AB12 from the local plan, as either proposed access points to the development could be hazardous and may fall foul of being legally compliant with highway laws
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q10 File 1</b>	6386430
<b>Q10 File 2</b>	6386429
<b>Q10 File 3</b>	6386431
<b>Attachments</b>	<a href="#">Locations of schools and lollipop crossings.png (1)</a> <a href="#">Entrance to Albert St showing unusual junction - 1.png (1)</a> <a href="#">Google Maps view from proposed entrance to site looking up Diglake St.png (2)</a>

<b>Comment ID</b>	NULLP53
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Allen
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	lw53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: 2 / 3 - The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services. The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site. 2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. 3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP50

<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Allen
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	lw53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: 2 / 3 · The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services. The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site. 2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. 3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP51
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Allen
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	lw53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. 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Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). 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The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. 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<b>Q7 Modification</b>	<p>7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP52

<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Allen
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	lw53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: 2 / 3 · The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services. The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site. 2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. 3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP977
<b>Order</b>	69
<b>Title</b>	Policy EMP2: Existing Employment Sites
<b>Consultee Company / Organisation</b>	Allied Bakeries
<b>Consultee Family Name</b>	Allied Bakeries
<b>Agent Company / Organisation</b>	Rapleys LLP
<b>Agent Position</b>	Associate Planner
<b>Agent Family Name</b>	Hirose
<b>Agent Given Name</b>	Wakako
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Allied Bakeries is a longstanding Class B2 wholesale bakery operating from its factory located on Liverpool Road in Newcastle under Lyme. The Allied Bakeries site and surrounding employment/commercial uses are not designated as employment land.</p> <p>In this context, we strongly object to Policy EMP2 which states that, within areas of existing employment land, proposals for alternative uses will be considered positively. The policy, as drafted, is not in line with the National Planning Policy Framework (NPPF) (2023), which places significant weight on the need to support economic growth and productivity as well as one of the draft Local Plan's strategic visions for the Borough seeking to support the growth of businesses (paragraph 4.2).</p> <p>The supporting information explains the intention of Policy EMP2, which is to retain existing employment areas unless there is a reasonable prospect of the land being use for that purpose and to ensure that existing businesses can continue to operate efficiently. However, the wording of the policy is such that it could potentially facilitate the development of residential use adjacent to existing Class B2 operations without a robust assessment and consideration of its impact on the ongoing operation and potential growth of the business. In particular:</p> <ul style="list-style-type: none"> <li>• The reference to considering alternative uses positively, rather than robustly protecting existing employment uses and their potential growth, is inappropriate where the intention of the policy is to retain existing employment areas and to protect existing businesses continuing to operate and grow.</li> <li>• How criteria a) to d) should be assessed in the decision-making process is not clear or robust to ensure that existing businesses can continue to operate and grow. In particular, criterion d) is not clear.</li> </ul>
<b>Q7 Modification</b>	See attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In order to respond to the Inspector's MIQs on this matter effectively and clearly.
<b>Attachments</b>	<a href="#">1364306 Allied Bakeries V1.pdf</a>



<b>Comment ID</b>	NULLP1375
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Andrzejewski
<b>Consultee Given Name</b>	Susan
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1431
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Andrzejewski
<b>Consultee Given Name</b>	Susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP240
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This representation is drafted in a form that would assist the Local Plan Inspector in framing the Examination Matters and Issues, notwithstanding that in its current form the Draft Local Plan is unsound. All matters raised are in summary only, and would be taken forward in detail as Examination hearing statements as required in due course.</p> <p>The Draft Plan is unclear in a number of critical matters, which are raised in this representation. It should be re-drafted to take up these aspects.</p> <p>PSD1:</p> <p>The Draft Plan demonstrates a myopic understanding of the Borough and its fundamental relationship in an urban context to Unitary Stoke-on-Trent; probably borne out by the decision not to proceed with a Joint Plan because of intrinsic politics. This is for example demonstrated by its downplaying of 'Chatterley Valley Lowlands Road' (Policy BW1) as part of much more significant cross-boundary strategic area as part of the Ceramic Valley Enterprise Zone on the northern A500 to give impetus to urban growth. 'Land at Junction 16 M6' (Policy AB2) is equally to the north of the Borough and the wider conurbation. This northern spatial emphasis is clearly the economic activity driver – which is defied by the Draft Plan's residential growth balance being to the south.</p> <p>This demonstrates a fundamental spatial planning flaw that beset the early Cheshire East Local Plan 2010-30 (adopted in 2017) where two major changes to its spatial planning strategy driven by Inspector letters were required to achieve soundness.</p>
<b>Q7 Modification</b>	<p>Due to the scale and nature of the flaws identified in this representation so far in respect of Policies PSD1 and PSD3, the Council's new mandatory housing target, the NPPF planned changes in particular its advice in relation to Green Belt has major impact on Policy PSD5, there is need to fully re-evaluate the proposals in this regard. One straightforward matter is to re-prioritise the north of the Borough for development in order to re-balance the spatial economic strategy.</p> <p>The Green Belt Review 2017 needs fundamental review, including taking into account relevant NPPF changes like 'grey belt' and other more relaxed criteria-based approaches to appropriate development in the Green Belt. The current Review is rendered out of date by now not being consistent with current and proposed national policy.</p> <p>A distinct example of how a brownfield opportunity of appropriate development in the Green Belt (with others in locality) within a priority area for regeneration is demonstrated at the end of this representation. Plan changes</p> <p>Local Plan experience would say that it is highly questionable whether this version of the Draft Plan can proceed to Examination due to the significant matters raised above. In the event that the Draft Plan can take a positive forward direction the following actions are recommended:</p> <ul style="list-style-type: none"> <li>• PSD1 – to thoroughly re-assess the Spatial Development Strategy in the manner that was undertaken by the Cheshire East Local Plan 2010-30 and how the Inspector dealt with the same aspect in his Interim report and further Interim report. The final outcome was sound and adopted.</li> <li>• PSD1 – to re-work the Plan requirement based on an up-to-date mandatory housing target, uplifting the current scale of housing development by around at least 50%. This is not a quick-fix matter. Solihull MBC has been pursuing such an uplift for such a length of time that PINS have recommended that their Draft Plan be withdrawn.</li> </ul> <p>As a prime example of how the current Draft Plan has 'missed the boat' the following example demonstrates a totally discarded site which is surely amongst others which need a more justified approach and recognition rather than a simplistic dismissal.</p> <p>This particular site has been the subject of SHELAA submissions dating back to 2008 (ref 422) and has received analysis under the Green Belt Assessment (Part 2) Study as Site RC14.</p> <p>The aforementioned Assessment was very detailed in nature and in recognition of the site being assessed as making a weak contribution to Green Belt purposes and was recommended for further consideration. It's potential for sustainable small-scale growth adjacent to Kidsgrove and its local facilities was recognised.</p> <p>The site is clearly Brownfield / previously developed land with a substantial former farm complex of substantial buildings now in commercial use plus associated substantial hard standings. The site should form part of the Brownfield Land Register for Newcastle Borough.</p>

	<p>The Newcastle Borough Regulation 18 First Draft Local Plan (June 2023) Exceptional Circumstances for Green Belt release sets an important context. At 5.10 it states 'suitable previously developed land was prioritised for development during the site selection process'. It then refers to constraints typically associated with development of brownfield sites, such as lack of economic viability and land contamination. In relation to Site RC 14 – which does not form part of the Plan; 7.1 of the report confirms urban and brownfield sites have received site allocation focus, and that 'wherever a brownfield site was assessed to be suitable, this land has been allocated'. This is clearly not the case with Site RC 14. Perversely the Draft Plan at states that 'the lack of brownfield land ... within the urban boundary has resulted in the need to consider sites beyond the urban boundary'. This site being cross-boundary demonstrates an ever-greater justification for allocation in relation to Stoke's substantial housing requirements. Further, smaller sites such are critical to meeting early 5 year housing land supply requirements, with large strategic sites proven to have long lead-in times to delivery. This site could be fully developed within 3 years; at most 5 years. This is an example of how the Site selection process is flawed.</p> <p>The Draft Local Plan is scant in relation to its Spatial Growth reasoning, but clearly emanates from the more fulsome Issues &amp; Options which showed strong reasoning behind Green Belt release around Kidsgrove, the Borough's second largest settlement with strong connectivity. The Green Belt Assessment Study in this context recommended that four sites (NC4, NC5, NC13 and RC14) be taken forward for further consideration. None of these sites are proposed allocations – only site KG6 is promoted in the Plan as offering estimated 6 dwellings. The Draft Plan Policy PSD 3: Settlement Hierarchy promoting substantial growth of Kidsgrove Urban Centre is totally imbalanced in this respect.</p> <p>The NPPF has a whole range of relevance to the allocation of Site RC 14. National policy calls for 'a variety and mix of land' (Para 60), a priority for sites that are deliverable in 5 years (69a) and that at least 10% of housing requirements should be made up of small sites (70) in recognition of main supply and delivery of housing requirements (74-77). Paras 24-27 highlight the need for joint co-operation in Plan making and the tests of soundness at Para 35. Para 1 refers to making effective use of land and emphasis to the role of small sites.</p> <p>The Levelling up &amp; Regeneration Bill 2023 fingerposts 'local planning authorities to deliver as many houses as possible on land which has been previously developed'. Further, the Government announced on 13 February 2024 an even greater emphasis on prioritising such land and respect this in policy setting. They stated that 'the brownfield presumption will be strictly enforced' and announced 'a rocket boost to bringing forward as much previously used land as possible to deliver much needed housing'. This is stated to be followed up by an even stronger 'brownfield first presumption on development' through a planned revised NPPF and National Development Management Policies in 2024.</p> <p>The Draft Plan overlooks brownfield development opportunities in favour of in many instances open green belt sites with no logical circumstance in favour of allocation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP245
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This representation is drafted in a form that would assist the Local Plan Inspector in framing the Examination Matters and Issues, notwithstanding that in its current form the Draft Local Plan is unsound. All matters raised are in summary only, and would be taken forward in detail as Examination hearing statements as required in due course.</p> <p>The Draft Plan is unclear in a number of critical matters, which are raised in this representation. It should be re-drafted to take up these aspects.</p> <p>The shortcomings of Policy PSD1 also of course impacts on Policy PSD3 and resulting Site Allocations.</p>

#### PSD5

Concerns have been raised in previous disregarded representations in relation to the 2017 Arup Green Belt Assessment Report. These have been in relation to the Brownfield cross-boundary (Newcastle Borough / Stoke City) site assessed as Review site RC14 and SHEELA site 422. Further details in this respect are included later, solely to back up significant flaws which need to be addressed.

The Draft Plan proposes to release 14no sites from the Green Belt in a highly sporadic and often unjustified manner as a sort of 'pick-n-mix' exercise rather than any synergy with a justified spatial economic strategy. Equally, and fundamentally it significantly overrides its own Green Belt Review recommendations for a variety of spurious unevidenced reasoning. This significantly undermines its credibility as the most effective and sound strategy.

The new mandatory housing targets and the now age of the 2017 Arup Green Belt Review, plus the proposed NPPF fundamental requirement to define and examine green belt opportunities for appropriate development including 'grey belt' of previously developed and lower quality Green Belt really calls for the need for a fundamentally refreshed Green Belt Review process. The current Draft Plan's Green Belt approach is unsound in particular its irrationality and its inconsistency with current and proposed national policy.

Draft Plan Policy PSD5 will also need to be modified in the context of major modifications to Policies PSD1 and PSD3 and the changes to Green Belt approaches as set out in evolving national policy.

#### Q7 Modification

Due to the scale and nature of the flaws identified in this representation so far in respect of Policies PSD1 and PSD3, the Council's new mandatory housing target, the NPPF planned changes in particular its advice in relation to Green Belt has major impact on Policy PSD5, there is need to fully re-evaluate the proposals in this regard. One straightforward matter is to re-prioritise the north of the Borough for development in order to re-balance the spatial economic strategy.

The Green Belt Review 2017 needs fundamental review, including taking into account relevant NPPF changes like 'grey belt' and other more relaxed criteria-based approaches to appropriate development in the Green Belt. The current Review is rendered out of date by now not being consistent with current and proposed national policy.

A distinct example of how a brownfield opportunity of appropriate development in the Green Belt (with others in locality) within a priority area for regeneration is demonstrated at the end of this representation. Plan changes

Local Plan experience would say that it is highly questionable whether this version of the Draft Plan can proceed to Examination due to the significant matters raised above. In the event that the Draft Plan can take a positive forward direction the following actions are recommended:

- PSD5 – a total review of the Green Belt Review 2017 taking in to account the above matters and importantly the NPPF changes and how its criteria based evaluations become sound enough to properly justify Green Belt release in a manner that the current Draft Plan's 14 Green Belt sites are not.

As a prime example of how the current Draft Plan has 'missed the boat' the following example demonstrates a totally discarded site which is surely amongst others which need a more justified approach and recognition rather than a simplistic dismissal.

This particular site has been the subject of SHELA submissions dating back to 2008 (ref 422) and has received analysis under the Green Belt Assessment (Part 2) Study as Site RC14.

The aforementioned Assessment was very detailed in nature and in recognition of the site being assessed as making a weak contribution to Green Belt purposes and was recommended for further consideration. It's potential for sustainable small-scale growth adjacent to Kidsgrove and its local facilities was recognised.

The site is clearly Brownfield / previously developed land with a substantial former farm complex of substantial buildings now in commercial use plus associated substantial hard standings. The site should form part of the Brownfield Land Register for Newcastle Borough.

The Newcastle Borough Regulation 18 First Draft Local Plan (June 2023) Exceptional Circumstances for Green Belt release sets an important context. At 5.10 it states 'suitable previously developed land was prioritised for development during the site selection process'. It then refers to constraints typically associated with development of brownfield sites, such as lack of economic viability and land contamination. In relation to Site RC 14 – which does not form part of the Plan; 7.1 of the report confirms urban and brownfield sites have received site allocation focus, and that 'wherever a brownfield site was assessed to be suitable, this land has been allocated'. This is clearly not the case with Site RC 14. Perversely the Draft Plan at states that 'the lack of brownfield land ... within the urban boundary has resulted in the need to consider sites beyond the urban boundary'. This site being cross-boundary demonstrates an ever-greater justification for allocation in relation to Stoke's substantial housing requirements. Further, smaller sites such are critical to meeting early 5 year housing land supply requirements, with large strategic sites proven to have long lead-in times to delivery. This site could be fully developed within 3 years; at most 5 years. This is an example of how the Site selection process is flawed.

The Draft Local Plan is scant in relation to its Spatial Growth reasoning, but clearly emanates from the more fulsome Issues & Options which showed strong reasoning behind Green Belt release around Kidsgrove, the Borough's second largest settlement with strong connectivity. The Green Belt Assessment Study in this context recommended that four sites (NC4, NC5, NC13 and RC14) be taken forward for further consideration. None of these sites are proposed allocations – only site KG6 is promoted in the Plan as offering estimated 6 dwellings. The Draft Plan Policy PSD 3: Settlement Hierarchy promoting substantial growth of Kidsgrove Urban Centre is totally imbalanced in this respect.



	<p>The NPPF has a whole range of relevance to the allocation of Site RC 14. National policy calls for 'a variety and mix of land' (Para 60), a priority for sites that are deliverable in 5 years (69a) and that at least 10% of housing requirements should be made up of small sites (70) in recognition of main supply and delivery of housing requirements (74-77). Paras 24-27 highlight the need for joint co-operation in Plan making and the tests of soundness at Para 35. Para 1 refers to making effective use of land and emphasis to the role of small sites.</p> <p>The Levelling up &amp; Regeneration Bill 2023 fingerposts 'local planning authorities to deliver as many houses as possible on land which has been previously developed'. Further, the Government announced on 13 February 2024 an even greater emphasis on prioritising such land and respect this in policy setting. They stated that 'the brownfield presumption will be strictly enforced' and announced 'a rocket boost to bringing forward as much previously used land as possible to deliver much needed housing'. This is stated to be followed up by an even stronger 'brownfield first presumption on development' through a planned revised NPPF and National Development Management Policies in 2024.</p> <p>The Draft Plan overlooks brownfield development opportunities in favour of in many instances open green belt sites with no logical circumstance in favour of allocation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p> <p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP242
<b>Order</b>	83
<b>Title</b>	Policy RET5: Kidsgrove Town Centre
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This representation is drafted in a form that would assist the Local Plan Inspector in framing the Examination Matters and Issues, notwithstanding that in its current form the Draft Local Plan is unsound. All matters raised are in summary only, and would be taken forward in detail as Examination hearing statements as required in due course.</p> <p>The Draft Plan is unclear in a number of critical matters, which are raised in this representation. It should be re-drafted to take up these aspects.</p> <p>Policy RET 5 (Kidsgrove Town Centre) provides a policy context but there is nothing of substance in terms of planned development to achieve its effectiveness.</p> <p>Therefore, the Draft Plan does not appropriately reflect and respond to the economic context. Neither does it respond to the new mandatory up-to-date housing target nor deal with much publicised historic under delivery across the Borough resulting in numerous appeal related developments.</p> <p>RET5</p> <p>Policy RET5 sets a context for Kidsgrove Town Centre, but is merely a context for a public sector package of improvements. These will be short lived and in effect demonstrate a very lacking approach to stimulating growth of a second-tier town in the locality of significant employment growth.</p> <p>The housing target set is not being met by any distance – just 12no houses in Kidsgrove and Ravenscliffe – and should be seriously re-examined at least in the manner of taking forward the other sites recommended in the 2017 Arup report which were spuriously discarded.</p>

<p><b>Q7 Modification</b></p>	<p>Due to the scale and nature of the flaws identified in this representation so far in respect of Policies PSD1 and PSD3, the Council's new mandatory housing target, the NPPF planned changes in particular its advice in relation to Green Belt has major impact on Policy PSD5, there is need to fully re-evaluate the proposals in this regard. One straightforward matter is to re-prioritise the north of the Borough for development in order to re-balance the spatial economic strategy.</p> <p>The Green Belt Review 2017 needs fundamental review, including taking into account relevant NPPF changes like 'grey belt' and other more relaxed criteria-based approaches to appropriate development in the Green Belt. The current Review is rendered out of date by now not being consistent with current and proposed national policy.</p> <p>A distinct example of how a brownfield opportunity of appropriate development in the Green Belt (with others in locality) within a priority area for regeneration is demonstrated at the end of this representation. Plan changes</p> <p>Local Plan experience would say that it is highly questionable whether this version of the Draft Plan can proceed to Examination due to the significant matters raised above. In the event that the Draft Plan can take a positive forward direction the following actions are recommended:</p> <ul style="list-style-type: none"> <li>• RET5 Kidsgrove needs a fundamental review, and an effective regeneration development package of growth promoted.</li> </ul> <p>As a prime example of how the current Draft Plan has 'missed the boat' the following example demonstrates a totally discarded site which is surely amongst others which need a more justified approach and recognition rather than a simplistic dismissal.</p> <p>This particular site has been the subject of SHELAA submissions dating back to 2008 (ref 422) and has received analysis under the Green Belt Assessment (Part 2) Study as Site RC14.</p> <p>The aforementioned Assessment was very detailed in nature and in recognition of the site being assessed as making a weak contribution to Green Belt purposes and was recommended for further consideration. It's potential for sustainable small-scale growth adjacent to Kidsgrove and its local facilities was recognised.</p> <p>The site is clearly Brownfield / previously developed land with a substantial former farm complex of substantial buildings now in commercial use plus associated substantial hard standings. The site should form part of the Brownfield Land Register for Newcastle Borough.</p> <p>The Newcastle Borough Regulation 18 First Draft Local Plan (June 2023) Exceptional Circumstances for Green Belt release sets an important context. At 5.10 it states 'suitable previously developed land was prioritised for development during the site selection process'. It then refers to constraints typically associated with development of brownfield sites, such as lack of economic viability and land contamination. In relation to Site RC 14 – which does not form part of the Plan; 7.1 of the report confirms urban and brownfield sites have received site allocation focus, and that 'wherever a brownfield site was assessed to be suitable, this land has been allocated'. This is clearly not the case with Site RC 14. Perversely the Draft Plan at states that 'the lack of brownfield land ... within the urban boundary has resulted in the need to consider sites beyond the urban boundary'. This site being cross-boundary demonstrates an ever-greater justification for allocation in relation to Stoke's substantial housing requirements. Further, smaller sites such are critical to meeting early 5 year housing land supply requirements, with large strategic sites proven to have long lead-in times to delivery. This site could be fully developed within 3 years; at most 5 years. This is an example of how the Site selection process is flawed.</p> <p>The Draft Local Plan is scant in relation to its Spatial Growth reasoning, but clearly emanates from the more fulsome Issues &amp; Options which showed strong reasoning behind Green Belt release around Kidsgrove, the Borough's second largest settlement with strong connectivity. The Green Belt Assessment Study in this context recommended that four sites (NC4, NC5, NC13 and RC14) be taken forward for further consideration. None of these sites are proposed allocations – only site KG6 is promoted in the Plan as offering estimated 6 dwellings. The Draft Plan Policy PSD 3: Settlement Hierarchy promoting substantial growth of Kidsgrove Urban Centre is totally imbalanced in this respect.</p> <p>The NPPF has a whole range of relevance to the allocation of Site RC 14. National policy calls for 'a variety and mix of land' (Para 60), a priority for sites that are deliverable in 5 years (69a) and that at least 10% of housing requirements should be made up of small sites (70) in recognition of main supply and delivery of housing requirements (74-77). Paras 24-27 highlight the need for joint co-operation in Plan making and the tests of soundness at Para 35. Para 1 refers to making effective use of land and emphasis to the role of small sites.</p> <p>The Levelling up &amp; Regeneration Bill 2023 fingerposts 'local planning authorities to deliver as many houses as possible on land which has been previously developed'. Further, the Government announced on 13 February 2024 an even greater emphasis on prioritising such land and respect this in policy setting. They stated that 'the brownfield presumption will be strictly enforced' and announced 'a rocket boost to bringing forward as much previously used land as possible to deliver much needed housing'. This is stated to be followed up by an even stronger 'brownfield first presumption on development' through a planned revised NPPF and National Development Management Policies in 2024.</p> <p>The Draft Plan overlooks brownfield development opportunities in favour of in many instances open green belt sites with no logical circumstance in favour of allocation.</p>
<p><b>Q8 Hearing attendance</b></p>	<p>Yes, I wish to participate in hearing session(s)</p>
<p><b>Q9 Hearing reasons</b></p>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>

	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP246
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Whilst there is planned allocated new housing to the north of the Borough it is in complete imbalance with significant outlier developments in the south for example at Loggerheads (LW53) and the aforementioned Lyme Park at Keele (SP11) and Land South Of Newcastle Golf Club (TB19) both in the Green Belt. Reasonable examination demonstrates that the Draft Plan Spatial Strategy is totally unbalanced and does not correlate with current and future economic activity or public transport connections.</p> <p>Whilst Keele Science Park (KL15) may in the longer term become deliverable, any growth aspirations of the University need to be carefully examined in the context of delivery in relation to its significant rationalisation announced in May 2024. This questionable need in relation to the planned Green Belt released scale of development on Council-owned land at Lyme Park (Keele) SP11 of 900 dwellings clearly needs significant further examination of justified exceptional circumstances. Site allocation TB19 has no validity whatsoever.</p>
<b>Q7 Modification</b>	<ul style="list-style-type: none"> <li>Revisit sites like SP11 and TB19 to re-examine their economic and spatial credentials</li> </ul>
<b>Comment ID</b>	NULLP243
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This representation is drafted in a form that would assist the Local Plan Inspector in framing the Examination Matters and Issues, notwithstanding that in its current form the Draft Local Plan is unsound. All matters raised are in summary only, and would be taken forward in detail as Examination hearing statements as required in due course.</p> <p>The Draft Plan is unclear in a number of critical matters, which are raised in this representation. It should be re-drafted to take up these aspects.</p> <p>The shortcomings of Policy PSD1 also of course impacts on Policy PSD3 and resulting Site Allocations.</p> <p>PSD3:</p>

	<p>This exercise and its outcomes are fundamentally brought in to question through a change in the Draft Plan's mandatory housing target from 400 to 593 dwellings delivered per annum – a requirement of any final Plan to make this close to 50% shortfall. The current policy is out-of-date, ineffective and therefore unsound. Regrettably, without a further version of a Draft Plan to deal with this anomaly, and other significant flaws, the current version fails all four tests of soundness.</p> <p>As discussed earlier, the spatial distribution of development is flawed – with the main economic drivers at Junction 16 M6 and Chatterley Valley as part of the Ceramic Valley EZ in the distinct north of the Borough, which justifies and supports the regeneration of Kidsgrove Town Centre (Policy RET5). However the only proposed housing growth attributed to Kidsgrove against a Plan target of 800 (see PSD 3 'the urban centre of Kidsgrove is expected to accommodate 800 new homes') does in fact promote in the plan just an allocation of 6no through Policy KG6 William Road, Kidsgrove, a former public house site in the Kidsgrove and Ravenscliffe area.</p> <p>Site RC8 is not referenced in the Plan document but does appear on Map 7: Kidsgrove Ward Map as an allocation. This referenced 6no dwellings in the Regulation 18 Draft. This is a Plan anomaly.</p> <p>Whilst there is planned allocated new housing to the north of the Borough it is in complete imbalance with significant outlier developments in the south for example at Loggerheads (LW53) and the aforementioned Lyme Park at Keele (SP11) and Land South Of Newcastle Golf Club (TB19) both in the Green Belt. Reasonable examination demonstrates that the Draft Plan Spatial Strategy is totally unbalanced and does not correlate with current and future economic activity or public transport connections.</p> <p>Whilst Keele Science Park (KL15) may in the longer term become deliverable, any growth aspirations of the University need to be carefully examined in the context of delivery in relation to its significant rationalisation announced in May 2024. This questionable need in relation to the planned Green Belt released scale of development on Council-owned land at Lyme Park (Keele) SP11 of 900 dwellings clearly needs significant further examination of justified exceptional circumstances. Site allocation TB19 has no validity whatsoever.</p> <p>Policy PSD3 requires fundamental change to demonstrate it is positively prepared in the light of the above, in order to demonstrate whether it is justified. This is highly questionable against the requirement of increased housing delivery and other material factors raised in this representation.</p>
<p><b>Q7 Modification</b></p>	<p>Due to the scale and nature of the flaws identified in this representation so far in respect of Policies PSD1 and PSD3, the Council's new mandatory housing target, the NPPF planned changes in particular its advice in relation to Green Belt has major impact on Policy PSD5, there is need to fully re-evaluate the proposals in this regard. One straightforward matter is to re-prioritise the north of the Borough for development in order to re-balance the spatial economic strategy.</p> <p>The Green Belt Review 2017 needs fundamental review, including taking into account relevant NPPF changes like 'grey belt' and other more relaxed criteria-based approaches to appropriate development in the Green Belt. The current Review is rendered out of date by now not being consistent with current and proposed national policy.</p> <p>A distinct example of how a brownfield opportunity of appropriate development in the Green Belt (with others in locality) within a priority area for regeneration is demonstrated at the end of this representation. Plan changes</p> <p>Local Plan experience would say that it is highly questionable whether this version of the Draft Plan can proceed to Examination due to the significant matters raised above. In the event that the Draft Plan can take a positive forward direction the following actions are recommended:</p> <ul style="list-style-type: none"> <li>• PSD3 – to totally re-assess this based on the outcome of the first bullet point action above. Again, this exercise was undertaken with the Cheshire East Plan where similarly there was an initial north-south misfit and lack of understanding of economic drivers, which had to be the subject of serious 'homework' for that Council.</li> <li>• Prioritise transport links and public transport provision, which has no presence in the current Draft Plan.</li> </ul> <p>As a prime example of how the current Draft Plan has 'missed the boat' the following example demonstrates a totally discarded site which is surely amongst others which need a more justified approach and recognition rather than a simplistic dismissal.</p> <p>This particular site has been the subject of SHELAA submissions dating back to 2008 (ref 422) and has received analysis under the Green Belt Assessment (Part 2) Study as Site RC14.</p> <p>The aforementioned Assessment was very detailed in nature and in recognition of the site being assessed as making a weak contribution to Green Belt purposes and was recommended for further consideration. It's potential for sustainable small-scale growth adjacent to Kidsgrove and its local facilities was recognised.</p> <p>The site is clearly Brownfield / previously developed land with a substantial former farm complex of substantial buildings now in commercial use plus associated substantial hard standings. The site should form part of the Brownfield Land Register for Newcastle Borough.</p> <p>The Newcastle Borough Regulation 18 First Draft Local Plan (June 2023) Exceptional Circumstances for Green Belt release sets an important context. At 5.10 it states 'suitable previously developed land was prioritised for development during the site selection process'. It then refers to constraints typically</p>

	<p>associated with development of brownfield sites, such as lack of economic viability and land contamination. In relation to Site RC 14 – which does not form part of the Plan; 7.1 of the report confirms urban and brownfield sites have received site allocation focus, and that 'wherever a brownfield site was assessed to be suitable, this land has been allocated'. This is clearly not the case with Site RC 14. Perversely the Draft Plan at states that 'the lack of brownfield land ... within the urban boundary has resulted in the need to consider sites beyond the urban boundary'. This site being cross-boundary demonstrates an ever-greater justification for allocation in relation to Stoke's substantial housing requirements. Further, smaller sites such are critical to meeting early 5 year housing land supply requirements, with large strategic sites proven to have long lead-in times to delivery. This site could be fully developed within 3 years; at most 5 years. This is an example of how the Site selection process is flawed.</p> <p>The Draft Local Plan is scant in relation to its Spatial Growth reasoning, but clearly emanates from the more fulsome Issues &amp; Options which showed strong reasoning behind Green Belt release around Kidsgrove, the Borough's second largest settlement with strong connectivity. The Green Belt Assessment Study in this context recommended that four sites (NC4, NC5, NC13 and RC14) be taken forward for further consideration. None of these sites are proposed allocations – only site KG6 is promoted in the Plan as offering estimated 6 dwellings. The Draft Plan Policy PSD 3: Settlement Hierarchy promoting substantial growth of Kidsgrove Urban Centre is totally imbalanced in this respect.</p> <p>The NPPF has a whole range of relevance to the allocation of Site RC 14. National policy calls for 'a variety and mix of land' (Para 60), a priority for sites that are deliverable in 5 years (69a) and that at least 10% of housing requirements should be made up of small sites (70) in recognition of main supply and delivery of housing requirements (74-77). Paras 24-27 highlight the need for joint co-operation in Plan making and the tests of soundness at Para 35. Para 1 refers to making effective use of land and emphasis to the role of small sites.</p> <p>The Levelling up &amp; Regeneration Bill 2023 fingerposts 'local planning authorities to deliver as many houses as possible on land which has been previously developed'. Further, the Government announced on 13 February 2024 an even greater emphasis on prioritising such land and respect this in policy setting. They stated that 'the brownfield presumption will be strictly enforced' and announced 'a rocket boost to bringing forward as much previously used land as possible to deliver much needed housing'. This is stated to be followed up by an even stronger 'brownfield first presumption on development' through a planned revised NPPF and National Development Management Policies in 2024.</p> <p>The Draft Plan overlooks brownfield development opportunities in favour of in many instances open green belt sites with no logical circumstance in favour of allocation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p> <p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP247
<b>Order</b>	174
<b>Title</b>	Kidsgrove and Ravenscliffe
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RC8
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Site RC8 is not referenced in the Plan document but does appear on Map 7: Kidsgrove Ward Map as an allocation. This referenced 6no dwellings in the Regulation 18 Draft. This is a Plan anomaly.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)



<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP244
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>It is noted that significant levels of student accommodation are included within proposed housing land supply. This flaw has also been highlighted in those appeals, and also that Keele University has also made a public announcement of consolidation and rationalisation due to major funding constraint. This also undermines the Councils' vanity project, to develop the former Keele Golf Course which it owns as Allocation SP11 Lyme Park for over 800 dwellings as outwith any justification in economic strategy terms.</p>
<b>Q7 Modification</b>	<ul style="list-style-type: none"> <li>Revisit sites like SP11 and TB19 to re-examine their economic and spatial credentials.</li> </ul>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>
<b>Comment ID</b>	NULLP248
<b>Order</b>	174
<b>Title</b>	Kidsgrove and Ravenscliffe
<b>Consultee Family Name</b>	Anthony
<b>Consultee Given Name</b>	Sasha Ann and Stephen
<b>Agent Company / Organisation</b>	Wardell Armstrong LLP
<b>Agent Position</b>	Technical Director
<b>Agent Family Name</b>	Stoney
<b>Agent Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RC14
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>As a prime example of how the current Draft Plan has 'missed the boat' the following example demonstrates a totally discarded site which is surely amongst others which need a more justified approach and recognition rather than a simplistic dismissal.</p> <p>This particular site has been the subject of SHELAA submissions dating back to 2008 (ref 422) and has received analysis under the Green Belt Assessment (Part 2) Study as Site RC14.</p> <p>The aforementioned Assessment was very detailed in nature and in recognition of the site being assessed as making a weak contribution to Green Belt purposes and was recommended for further consideration. It's potential for sustainable small-scale growth adjacent to Kidsgrove and its local facilities was recognised.</p>



	<p>The site is clearly Brownfield / previously developed land with a substantial former farm complex of substantial buildings now in commercial use plus associated substantial hard standings. The site should form part of the Brownfield Land Register for Newcastle Borough.</p> <p>The Newcastle Borough Regulation 18 First Draft Local Plan (June 2023) Exceptional Circumstances for Green Belt release sets an important context. At 5.10 it states 'suitable previously developed land was prioritised for development during the site selection process'. It then refers to constraints typically associated with development of brownfield sites, such as lack of economic viability and land contamination. In relation to Site RC 14 – which does not form part of the Plan; 7.1 of the report confirms urban and brownfield sites have received site allocation focus, and that 'wherever a brownfield site was assessed to be suitable, this land has been allocated'. This is clearly not the case with Site RC 14. Perversely the Draft Plan at states that 'the lack of brownfield land ... within the urban boundary has resulted in the need to consider sites beyond the urban boundary'. This site being cross-boundary demonstrates an ever-greater justification for allocation in relation to Stoke's substantial housing requirements. Further, smaller sites such are critical to meeting early 5 year housing land supply requirements, with large strategic sites proven to have long lead-in times to delivery. This site could be fully developed within 3 years; at most 5 years. This is an example of how the Site selection process is flawed.</p> <p>The Draft Local Plan is scant in relation to its Spatial Growth reasoning, but clearly emanates from the more fulsome Issues &amp; Options which showed strong reasoning behind Green Belt release around Kidsgrove, the Borough's second largest settlement with strong connectivity. The Green Belt Assessment Study in this context recommended that four sites (NC4, NC5, NC13 and RC14) be taken forward for further consideration. None of these sites are proposed allocations – only site KG6 is promoted in the Plan as offering estimated 6 dwellings. The Draft Plan Policy PSD 3: Settlement Hierarchy promoting substantial growth of Kidsgrove Urban Centre is totally imbalanced in this respect.</p> <p>The NPPF has a whole range of relevance to the allocation of Site RC 14. National policy calls for 'a variety and mix of land' (Para 60), a priority for sites that are deliverable in 5 years (69a) and that at least 10% of housing requirements should be made up of small sites (70) in recognition of main supply and delivery of housing requirements (74-77). Paras 24-27 highlight the need for joint co-operation in Plan making and the tests of soundness at Para 35. Para 1 refers to making effective use of land and emphasis to the role of small sites.</p> <p>The Levelling up &amp; Regeneration Bill 2023 fingerposts 'local planning authorities to deliver as many houses as possible on land which has been previously developed'. Further, the Government announced on 13 February 2024 an even greater emphasis on prioritising such land and respect this in policy setting. They stated that 'the brownfield presumption will be strictly enforced' and announced 'a rocket boost to bringing forward as much previously used land as possible to deliver much needed housing'. This is stated to be followed up by an even stronger 'brownfield first presumption on development' through a planned revised NPPF and National Development Management Policies in 2024.</p> <p>The Draft Plan overlooks brownfield development opportunities in favour of in many instances open green belt sites with no logical circumstance in favour of allocation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>As a professionally qualified Planner I have been commissioned to represent a landowner in the Local Plan process for both Newcastle Borough and Stoke-on-Trent City Councils. I have significant experience in the Local Plan process including Plan Examinations.</p> <p>I wish to be offered the opportunity of further developing this representation through suitable topic hearing statements on key matters and issues, and appearance at Plan Examination sessions to ensure in particular participation on Plan soundness.</p>

<b>Comment ID</b>	NULLP472
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Ashmore
<b>Consultee Given Name</b>	Michelle
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Dear Newcastle-under-Lyme Brough Council,</p> <p>I the undersigned, as residents of Audley, wish to object to the proposals of four housing sites and a large employment site in the council's draft local plan for Audley. My objections are about both the proposals for Audley in general and also specifically about site AB15 which is at the back of my home where I live and would significantly and detrimentally impact my life.</p> <p>My objections to the proposals for Audley in general are an additional 250-270 homes with a further 1000 residents and a large employment site of over 170 acres warehouses will destroy the character of our beautiful village. As I sit here writing this letter to you, I can hear birds singing and am looking out on a beautiful green field with cows grazing which is a very healthy way to live, considering the fact that where I live has been so important in restoring my mental health if your proposals go ahead that will totally damagingly affect my life, the downward spiral mental health of so many residents and the quaint, picturesque village of Audley.</p> <p>In this regard, if only or mostly green belt sites are available in the Audley area, the Council does not have to build the number of houses it says it must, because government figures are only advisory. It therefore seems that the Council is choosing to build on green belt sites when it doesn't have to.</p> <p>Furthermore, it also seems that the number of houses proposed to be built on AB15 and around Audley is excessively weighted to this area compared to the rest of the Borough as a whole and are mostly on green-belt sites. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead, your plan overloads an already overloaded infrastructure area.</p> <p>The Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate justification. The proposed additional housing for the Audley area in general would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village are not enough to cope with a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities?</p> <p><b><u>SITE AB15</u></b></p> <p>I totally object to site AB15 being proposed for development for the following reasons:</p> <p>The roads leading to AB15 are Chester Road and Vernon Avenue which are already very congested, in parts very narrow, with built up housing and residents parking their cars along them which already creates dangerous and hazardous driving conditions. The roads are inadequate already for the current residents and even more so if there is additional traffic and houses, they will deteriorate even further with additional houses and cars.</p> <p>I am very concerned about road safety with regards to children walking to school, lots of older residents and dog walkers and additional cars will impact pedestrians and create more likelihood of accidents. Already getting in and out of driveways is dangerous.</p> <p>The local schools and medical facilities are already at full capacity, to the point where you have to wait for over an hour for calls to be answered, and unless it's a medical emergency day's to see a doctor, and then never the same GP which does not go hand in hand in living in a rural village, where do you propose additional or existing residents go? The dentist practice in the village is unable to take any additional NHS patients as it is already at its maximum. I along with other residents are already registered with a medical practice's and dentist's out of the area, as the current health provisions are stretched to capacity.</p> <p>When I, along with neighbours and other residents bought our properties it was due to the beautiful environment that surrounded them which was so important for us and our family. Wonderful green field's, which are green belt. One of which AB15 where you are proposing to build is behind the properties along Chester Road and Vernon Avenue, which will totally destroy the wellbeing of myself, my neighbours and village community. Currently the residents of Chester Road look out on a beautiful green meadow with gentle cows grazing, mature trees which are home to birds and bats that fill our day and night with sweet natural sounds and hedgerows which contain a huge array of wildlife complete our view, and help to maintain our mental health. I am concerned that I, along with other residents will become very ill if your proposal goes ahead. The loss of habitat, such as the mature trees and hedgerows with wildlife in them will affect our wellbeing and I am very concerned how this will impact not only me, but my neighbours, and residents who have become friend's. I cannot express how the loss of the rural aspect where we live would be devastating. I, along with all residents with properties along Chester Road and Vernon Avenue often sit out our secluded gardens to continue to enjoy the landscape and maintain our mental health, both in the day where we will be visited by lots of birds and squirrels, and during the evening as the sun is setting, where bat's often swoop, your proposed development could cause them to be lost. The loss of this beautiful open space, which is currently agricultural land and what I was led to believe outside of development boundary would be maximally damaging the landscape of our rural community.</p>

	<p>The loss of our visual amenity and environmental changes would be devastating and damage caused in our charming rural village from introduction of many more vehicles and houses would never recover this would affect us all.</p> <p>I also would like to comment on how challenging this process to object has been and how no information has been sent to our homes regarding your proposals. I have talked to friend's who are neighbour's and along with other residents who have found this process overwhelming and for many totally impossible, certainly for older residents who are not online, I don't feel this is acceptable. How are you helping these people in our community?</p> <p>I am greatly concerned on the impact on our mental health for myself, my neighbours, my friends and my community. A significant change in the environment will adversely affect us all. The change from green space to buildings would cause detrimental hard this cannot be underestimated.</p> <p>Thank you for reading this, I await your response to my letter of objection.</p>
<b>Comment ID</b>	NULLP476
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Ashmore
<b>Consultee Given Name</b>	Michelle
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Dear Newcastle-under-Lyme Brough Council,</p> <p>I the undersigned, as residents of Audley, wish to object to the proposals of four housing sites and a large employment site in the council's draft local plan for Audley. My objections are about both the proposals for Audley in general and also specifically about site AB15 which is at the back of my home where I live and would significantly and detrimentally impact my life.</p> <p>My objections to the proposals for Audley in general are an additional 250-270 homes with a further 1000 residents and a large employment site of over 170 acres warehouses will destroy the character of our beautiful village. As I sit here writing this letter to you, I can hear birds singing and am looking out on a beautiful green field with cows grazing which is a very healthy way to live, considering the fact that where I live has been so important in restoring my mental health if your proposals go ahead that will totally damagingly affect my life, the downward spiral mental health of so many residents and the quaint, picturesque village of Audley.</p> <p>In this regard, if only or mostly green belt sites are available in the Audley area, the Council does not have to build the number of houses it says it must, because government figures are only advisory. It therefore seems that the Council is choosing to build on green belt sites when it doesn't have to.</p> <p>Furthermore, it also seems that the number of houses proposed to be built on AB15 and around Audley is excessively weighted to this area compared to the rest of the Borough as a whole and are mostly on green-belt sites. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead, your plan overloads an already overloaded infrastructure area.</p> <p>The Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate justification. The proposed additional housing for the Audley area in general would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village are not enough to cope with a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities?</p>
<b>Comment ID</b>	NULLP475
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Ashmore
<b>Consultee Given Name</b>	Michelle
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Dear Newcastle-under-Lyme Brough Council,</p> <p>I the undersigned, as residents of Audley, wish to object to the proposals of four housing sites and a large employment site in the council's draft local plan for Audley. My objections are about both the proposals for Audley in general and also specifically about site AB15 which is at the back of my home where I live and would significantly and detrimentally impact my life.</p> <p>My objections to the proposals for Audley in general are an additional 250-270 homes with a further 1000 residents and a large employment site of over 170 acres warehouses will destroy the character of our beautiful village. As I sit here writing this letter to you, I can hear birds singing and am looking out on a beautiful green field with cows grazing which is a very healthy way to live, considering the fact that where I live has been so important in restoring my mental health if your proposals go ahead that will totally</p>

	<p>damagingly affect my life, the downward spiral mental health of so many residents and the quaint, picturesque village of Audley.</p> <p>In this regard, if only or mostly green belt sites are available in the Audley area, the Council does not have to build the number of houses it says it must, because government figures are only advisory. It therefore seems that the Council is choosing to build on green belt sites when it doesn't have to.</p> <p>Furthermore, it also seems that the number of houses proposed to be built on AB15 and around Audley is excessively weighted to this area compared to the rest of the Borough as a whole and are mostly on green-belt sites. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead, your plan overloads an already overloaded infrastructure area.</p> <p>The Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate justification. The proposed additional housing for the Audley area in general would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village are not enough to cope with a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities?</p>
<b>Comment ID</b>	NULLP473
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Ashmore
<b>Consultee Given Name</b>	Michelle
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Dear Newcastle-under-Lyme Brough Council,</p> <p>I the undersigned, as residents of Audley, wish to object to the proposals of four housing sites and a large employment site in the council's draft local plan for Audley. My objections are about both the proposals for Audley in general and also specifically about site AB15 which is at the back of my home where I live and would significantly and detrimentally impact my life.</p> <p>My objections to the proposals for Audley in general are an additional 250-270 homes with a further 1000 residents and a large employment site of over 170 acres warehouses will destroy the character of our beautiful village. As I sit here writing this letter to you, I can hear birds singing and am looking out on a beautiful green field with cows grazing which is a very healthy way to live, considering the fact that where I live has been so important in restoring my mental health if your proposals go ahead that will totally damagingly affect my life, the downward spiral mental health of so many residents and the quaint, picturesque village of Audley.</p> <p>In this regard, if only or mostly green belt sites are available in the Audley area, the Council does not have to build the number of houses it says it must, because government figures are only advisory. It therefore seems that the Council is choosing to build on green belt sites when it doesn't have to.</p> <p>Furthermore, it also seems that the number of houses proposed to be built on AB15 and around Audley is excessively weighted to this area compared to the rest of the Borough as a whole and are mostly on green-belt sites. Why have you not planned to deliver housing in the urban centre with amenities and infrastructure of a town already. Instead, your plan overloads an already overloaded infrastructure area.</p> <p>The Junction with the A500 already has capacity constraints and development in this area could exacerbate this without appropriate justification. The proposed additional housing for the Audley area in general would cause already inadequate roads to become impossibly congested and to deteriorate even further. Connected to this, given that the current schooling and health facilities in the village are not enough to cope with a sudden increase in population, would further development and therefore more land be needed to build more schooling and medical facilities?</p>

<b>Comment ID</b>	NULLP701
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Edward
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Objection to site AB2 on the map</p> <p>We consider that this part of the plan is</p> <p>NOT legally compliant</p> <p>NOT sound</p> <p>NOT compliant with Duty to Co-operate</p> <p>For the following reasons</p> <ul style="list-style-type: none"> <li>• Undue consideration has been given to how traffic will reach the site. The main route to site will result in the loss of a layby from the A500, which is a safety concern. The section of the A500 between Audley and junction 16 comes to a standstill if there is an accident on the M6. Traffic often diverts through Audley in these cases which causes issues with traffic flow on the roads. This will be worse still if HGVs and 3000 employees are diverting through the village.</li> <li>• If people from the borough are employed on the site, this will increase traffic through the village and surrounding routes to reach the site (there is no public transport or cycle paths to the site).</li> <li>• The roads in the village are narrow Victorian roads with cars parked on road, it is often grid locked at rush hour. The roads will be unpassable if HGVs and 1000s of workers are also using the roads.</li> <li>• The emergency exits to the site are to be on Park Lane and Barthomley Road. Both single track roads with no pavements. How will they stop workers and others from using these roads which cannot cope with much traffic. An example of this is the service slip roads off the Knutsford M6 junction used extensively and unlawfully by residents.</li> <li>• Lack of consideration for the environment and climate change. The land being proposed is good quality agricultural land and wildlife habitat. The land is currently a good carbon store whilst the development will increase carbon emissions.</li> <li>• The employment created will be low skilled, low paid jobs, which will be under threat from future automation. High skilled, high paid jobs would be more beneficial to residents of the borough.</li> <li>• Jobs won't necessarily be for local people as the site is commutable from as far away as Manchester and Birmingham.</li> <li>• The site is in the green belt and will mean a huge loss of countryside.</li> <li>• The site is isolated and disconnected from the local villages and the towns of Newcastle and Kidsgrove creating an urban blot on the landscape.</li> </ul>

<b>Comment ID</b>	NULLP702
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Emily
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Objection to site AB2 on the map</p> <p>We consider that this part of the plan is</p> <p>NOT legally compliant</p> <p>NOT sound</p> <p>NOT compliant with Duty to Co-operate</p> <p>For the following reasons</p> <ul style="list-style-type: none"> <li>• Undue consideration has been given to how traffic will reach the site. The main route to site will result in the loss of a layby from the A500, which is a safety concern. The section of the A500 between Audley and junction 16 comes to a standstill if there is an accident on the M6. Traffic often diverts through Audley in these cases which causes issues with traffic flow on the roads. This will be worse still if HGVs and 3000 employees are diverting through the village.</li> <li>• If people from the borough are employed on the site, this will increase traffic through the village and surrounding routes to reach the site (there is no public transport or cycle paths to the site).</li> <li>• The roads in the village are narrow Victorian roads with cars parked on road, it is often grid locked at rush hour. The roads will be unpassable if HGVs and 1000s of workers are also using the roads.</li> <li>• The emergency exits to the site are to be on Park Lane and Barthomley Road. Both single track roads with no pavements. How will they stop workers and others from using these roads which cannot cope with much traffic. An example of this is the service slip roads off the Knutsford M6 junction used extensively and unlawfully by residents.</li> <li>• Lack of consideration for the environment and climate change. The land being proposed is good quality agricultural land and wildlife habitat. The land is currently a good carbon store whilst the development will increase carbon emissions.</li> <li>• The employment created will be low skilled, low paid jobs, which will be under threat from future automation. High skilled, high paid jobs would be more beneficial to residents of the borough.</li> <li>• Jobs won't necessarily be for local people as the site is commutable from as far away as Manchester and Birmingham.</li> <li>• The site is in the green belt and will mean a huge loss of countryside.</li> <li>• The site is isolated and disconnected from the local villages and the towns of Newcastle and Kidsgrove creating an urban blot on the landscape.</li> </ul>



<b>Comment ID</b>	NULLP693
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Objection to site AB2 on the map</p> <p>We consider that this part of the plan is</p> <p>NOT legally compliant</p> <p>NOT sound</p> <p>NOT compliant with Duty to Co-operate</p> <p>For the following reasons</p> <ul style="list-style-type: none"> <li>• Undue consideration has been given to how traffic will reach the site. The main route to site will result in the loss of a layby from the A500, which is a safety concern. The section of the A500 between Audley and junction 16 comes to a standstill if there is an accident on the M6. Traffic often diverts through Audley in these cases which causes issues with traffic flow on the roads. This will be worse still if HGVs and 3000 employees are diverting through the village.</li> <li>• If people from the borough are employed on the site, this will increase traffic through the village and surrounding routes to reach the site (there is no public transport or cycle paths to the site).</li> <li>• The roads in the village are narrow Victorian roads with cars parked on road, it is often grid locked at rush hour. The roads will be unpassable if HGVs and 1000s of workers are also using the roads.</li> <li>• The emergency exits to the site are to be on Park Lane and Barthomley Road. Both single track roads with no pavements. How will they stop workers and others from using these roads which cannot cope with much traffic. An example of this is the service slip roads off the Knutsford M6 junction used extensively and unlawfully by residents.</li> <li>• Lack of consideration for the environment and climate change. The land being proposed is good quality agricultural land and wildlife habitat. The land is currently a good carbon store whilst the development will increase carbon emissions.</li> <li>• The employment created will be low skilled, low paid jobs, which will be under threat from future automation. High skilled, high paid jobs would be more beneficial to residents of the borough.</li> <li>• Jobs won't necessarily be for local people as the site is commutable from as far away as Manchester and Birmingham.</li> <li>• The site is in the green belt and will mean a huge loss of countryside.</li> <li>• The site is isolated and disconnected from the local villages and the towns of Newcastle and Kidsgrove creating an urban blot on the landscape.</li> </ul>

<b>Comment ID</b>	NULLP295
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>On this page I consider reasons why AB12 is unsound due to it being not effective. This has to do with the limited access to the site, especially for larger construction vehicles. As it stands there is no access from Great Oak Road. The only remotely feasible access points are at the bottom of Diglake Street and a farm track adjacent to 104 Ravens Lane.</p> <p>At its narrowest point, the track from Ravens Lane is 4.3 meters wide, delimited by sharp corners in the boundary walls of properties either side. This would make it impractical for the large vehicles required for construction on the site and for large emergency fire appliances.</p> <p>The potential access point at the bottom of Diglake Street is approximately 20 meters wide. However, the narrowness of Diglake Street and the adjacent Albert Street (around 5.2 meters) coupled with the fact that residents are forced to park their cars either side of these streets makes access next to impossible, especially for heavy vehicles required for the construction of a new estate.</p> <p>In order for effective access to the site it may be necessary to consider the demolition of existing properties if access is sought via Diglake Street, or the acquisition of land from properties either side of the track off Ravens Lane. It must also be born in mind that Ravens Lane itself has a high traffic flow and in places it is necessary for residents to park their vehicles both sides of the road along stretches where there are terraced houses. On this basis therefore, AB12 is not deliverable and therefore not effective.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far is planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP299
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The factors that limit the justification of AB12 apply equally well to AB15. Other factors specific to AB15, which may limit effectiveness as well as justification, are listed below.

	<p>In item 4 it is claimed that "...structures are designed to ensure they are not intrusive in significant views from the surrounding area...". However, this is already an open space where views from the properties backing onto Barleyfields and Chester Road, will be obstructed by any structures built there. Therefore, this claim is false.</p> <p>In item 9, mention is made of financial contributions for increased capacity of schools and health facilities. These costs are likely to consume much of the anticipated revenue that NuLBC hopes to gain from such developments. Knock on effects such as extra traffic will also contribute to already congested roads and more noise/pollution.</p> <p>In paragraph 13.38 of supporting information, it is said that AB15 is within walking distance of local services including schools and the health centre. However, these services are already at capacity and there are no specific measures specified as to how these services will be enhanced.</p> <p>In paragraph 13.39, it is noted that this area does have a flood risk. It is also a well-established fact that building on green fields exacerbates further flooding due to run-off. The properties and farm buildings to the northwest of the site will be most at risk due to them being at the lowest point on the site.</p> <p>In paragraph 13.41, required contributions to the Newcastle North Primary Care Network are identified. But there is no clear plan as to how the resulting increased population will benefit. Will some residents need to be registered with a GP's surgery elsewhere in the borough? If so, then this will lead to further traffic on already congested roads. Therefore, this is not sustainable.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far as planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP303
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

RC8 (p76, 6 dwellings, potential flood risk.)

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NC77 (p78)

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TK27 (p80).

Other sites which may also be questioned are

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The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".
2. <https://www.communityplanningalliance.org/> (accessed 28/06/2023) Also on Facebook (<https://www.facebook.com/groups/4286629018013916>)
3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021> (accessed 11/07/2023)
4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022> (accessed 11/07/2023), and for Wales, <https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure> (accessed 11/07/2023).
5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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References

Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.

Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP307
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1



**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

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	<p>basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.</p> <p>The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.</p> <p>Yours sincerely Jim Austin</p> <p>Notes</p> <ol style="list-style-type: none"> <li>1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".</li> <li>2. <a href="https://www.communityplanningalliance.org/">https://www.communityplanningalliance.org/</a> (accessed 28/06/2023) Also on Facebook (<a href="https://www.facebook.com/groups/4286629018013916">https://www.facebook.com/groups/4286629018013916</a>)</li> <li>3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021">https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021</a> (accessed 11/07/2023)</li> <li>4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <a href="https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022">https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022</a> (accessed 11/07/2023), and for Wales, <a href="https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure">https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure</a> (accessed 11/07/2023).</li> <li>5. <a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro</a> (accessed 28/06/2023)</li> <li>6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)</li> </ol> <p>References</p> <p>Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.</p> <p>Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.</p>
<b>Comment ID</b>	NULLP294
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>On the next two pages I address specific points from the local plan, which alone may render AB2 unsound.</p> <p>In item 2, dealing with the safety of any proposed junction near to junction 16 of the M6; the safety of such a junction is questionable given that, at the time of writing, there was a three vehicle accident on the A500 approximately four hours earlier (midday 20/09/2024). Incidents like this are a regular occurrence. Therefore, the new proposed junction will only elevate the accident risk, congestion and more pollution. Regarding pollution, Audley is already ranked 10th in the UK for respiratory diseases. Emergency access on Barthomley Road or Park Lane is also questionable given that they are accessed via a network of single track country roads.</p> <p>Item 7, addresses mitigation measures for adverse impacts on the M6 near junction 16. As mentioned on the previous page, Highways England is unlikely to have the funds available during the period of the plan to implement the necessary measures.</p> <p>Item 8 deals with noise and air quality mitigation measures. However, nothing specific is mentioned. Is there suitable, proven pollution absorption technology that can be installed at the site, which can mitigate against air quality that will certainly be degraded as a result of the employment site at AB2?</p> <p>Item 9 claims that the layout of the development will be "landscape led" with roads and buildings sympathetic to the existing green landscape. It is difficult to see how a one million sqft warehouse, roughly</p>

	<p>20 meters high can be blended into a green landscape. I'm afraid such claims can only be described as complete nonsense.</p> <p>In item 10, the proposal is to retain much of the green features with retention of and enhancement of mature trees... For example, how do you enhance mature trees? If that means increasing their number, then they can only be grown from saplings hence they are not mature. Unless, of course they intend to transplant them from elsewhere.</p> <p>Item 13 deals with travel infrastructure. How will this be funded? Walking or cycling is only feasible for commuters from the local villages. More likely employees will commute from a distance. A special local bus service will only be funded for a limited time, if at all. This is neither sustainable nor deliverable. Therefore, it is not effective.</p> <p>Item 14 mentions enhancement of green infrastructure. While the establishment of green infrastructure is welcome, it can in no way replace the green landscape existing prior to the development. The loss of biomass including vegetation and top soil sustaining the areas food production capacity, carbon draw down and absorption of other pollutants, is never mentioned in proposals like this because it is irreversible. This is an example of 'greenwashing', which when highlighted, limits justification for this development.</p> <p>Paragraph 13.18 of the supporting information describes mitigations for loss of visual amenity for residents living adjacent to the site. Specifically mentioned is a natural buffer to hide the urban form of the development. However, any such buffer could itself be construed as an intrusion on the open landscape existing prior to the development.</p> <p>Paragraph 13.19 describes mitigations to the natural character of the site post development. However, given that 63 hectares is provision for employment and only 22 hectares is needed borough wide, this leaves another 41 hectares of natural farmland consumed by the development for no justifiable reason. Moreover, this is not including the loss of natural landscape required for the lorry park, substation and the drainage infrastructure.</p> <p>Paragraph 13.21 addresses climate change through a general policy CRE1. However, this can only make up for the loss of natural climate change mitigation if the development is to include an active atmospheric CO2 absorption plant. The only mention of CO2 sequestration is in the supporting information, paragraph 11.61 of policy SE11, which is by natural means. Therefore, this development is detrimental to the global climate crisis. which significantly limits its justification.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far as planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP298
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Paragraph 13.32 highlight potential flooding issues associated with this site, some of which have been discussed on the previous page. The site in its existing form presents an effective barrier, soaking up and temporarily retaining a large volume of water during periods of intense rainfall. If this development goes ahead, then this barrier will be compromised. It is likely Brierly Brook would become blocked by top soil washed off the field north of the site, leading to an even greater flood risk.</p>

	<p>In paragraph 13.36, required contributions to the Newcastle North Primary Care Network are identified. But there is no clear plan as to how the resulting increased population will benefit. Will some residents need to be registered with a GP's surgery elsewhere in the borough? If so, then this will lead to more traffic on already congested roads. This therefore is not sustainable.</p> <p>In paragraph 13.37 it is stated that any future planning applications will be decided on the basis of details therein. Many of the points raised in the supporting information appear to stress reasons why development on this site is inappropriate. Moreover, if it is retained in the local plan, developers always have the option of appeal to Westminster, which under the current Labour administration would likely be granted leading to the risk of an inappropriate development. This proposal is certainly not justified and there are many obstacles to its deliverability. It should therefore be removed from the local plan.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far as planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP302
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2



**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

AB32(p75)



AB33(p75).

Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

RC8 (p76, 6 dwellings, potential flood risk.)

KS3 (p77)

LW53 (p77)

MD29 (p78, 150 dwellings, likely to conflict with HS2 construction?)

NC13 (p78)

NC77 (p78)

SP11 (p78, 900 dwellings, former Keele golf course)

SP12 (p79)

SP23 (p79)

TB19 (p79)

TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

TK10 (p80)

TK17 (p80)

TK27 (p80).

Other sites which may also be questioned are

KS17 (p77, would include loss of playing fields and other village amenities. This may be classed as infill.)

KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".
2. <https://www.communityplanningalliance.org/> (accessed 28/06/2023) Also on Facebook (<https://www.facebook.com/groups/4286629018013916>)
3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021> (accessed 11/07/2023)
4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022> (accessed 11/07/2023), and for Wales, <https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure> (accessed 11/07/2023).
5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)

References

Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.

Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP306
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18

**Q6 Details**

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Yours sincerely  
Jim Austin

Notes

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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References

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<b>Comment ID</b>	NULLP310
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53



**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

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Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

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<b>Comment ID</b>	NULLP314
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23

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	<p>basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.</p> <p>The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.</p> <p>Yours sincerely Jim Austin</p> <p>Notes</p> <ol style="list-style-type: none"> <li>1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".</li> <li>2. <a href="https://www.communityplanningalliance.org/">https://www.communityplanningalliance.org/</a> (accessed 28/06/2023) Also on Facebook (<a href="https://www.facebook.com/groups/4286629018013916">https://www.facebook.com/groups/4286629018013916</a>)</li> <li>3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021">https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021</a> (accessed 11/07/2023)</li> <li>4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <a href="https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022">https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022</a> (accessed 11/07/2023), and for Wales, <a href="https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure">https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure</a> (accessed 11/07/2023).</li> <li>5. <a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro</a> (accessed 28/06/2023)</li> <li>6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)</li> </ol> <p>References</p> <p>Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.</p> <p>Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.</p>
<b>Comment ID</b>	NULLP296
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>On this page I consider factors that limit the justification of AB12, rendering this site as unsound as far as the Local Plan is concerned. These considerations also apply to the two other neighbouring sites AB15 and AB33.</p> <p>In paragraph 6 of the Housing and Economic Needs Assessment Update (ED001, April, 2024), modelling for population growth in the borough suggests an increase of 5460 during the period 2023-40. Using the national average household size of 2.4, this can be accommodated by 2275 new dwellings. Over the same period this translates to 134 dwellings/annum.</p> <p>It is quoted that the 'standard method' yields a requirement of 347 dwellings/annum, nearly 2.6 times the estimate above. But this depends on a base need derived from the 2014 population projections, a point which is within the period of the 2011-21 census. However, during this period the population of the borough actually fell by 0.5%. The projected housing need of 347 dwellings/annum is therefore out of date. There will also be downward pressure on further population growth nationally, given that this was an election pledge of the new Labour administration. Any post COVID spike in population growth within the borough is likely due to an influx of Keele University students, mainly from overseas, an increase which is likely to be temporary, especially given that demand for student places is falling.</p> <p>Considering a working age (16-64) population, and assuming an average life expectancy of 81 (79 for men and 83 for women), the working age population would increase by 3236. This would translate to</p>



	<p>190 new jobs created per annum. This is very close to the lower estimate (194) modelled in paragraph 8 of ED001. And yet the Borough are claiming that this warrants an increase in the number of new dwellings per year of 15% to 400. It is easily seen that this translates to 6800 new dwellings within the borough (8000 if we use the period 2020-40). So why do we need 6800 new dwellings to accommodate 5460 individuals? Even with the standard method, the minimum housing needed for in the borough is 5899, still greater than the margin of population increase. This makes no sense. Where a modest growth in the borough is called for, the Borough should consider brown field sites first along with land banked sites including those where the footings are already in place. Coupled with the unsoundness of AB2, this would negate the requirement for housing at AB12 and other similar green belt/green field sites.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far as planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP300
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The factors that limit the justification of AB12 apply equally well to AB33. Other factors specific to AB33, which may limit effectiveness as well as justification, are listed below.</p> <p>In item 7, the intention is to mitigate against flooding by concentrating development to areas of least at risk. With the exception of a slight rise of approximately 10 meters at the eastern boundary of the site, the area is largely flat and low lying. Therefore, most of the site area is at risk of flooding, which is being exacerbated by the current effects of climate change.</p> <p>Item 11 addresses the need for contributions to increase capacity for local schools and health services. However, there are no specifics as to how these contributions will be applied. Due to its proximity to the AB15 site, the arguments applied to item 9 in regard to AB15 apply here also.</p> <p>In paragraph 13.43 of supporting information, it is implied that the flood risk, mentioned in item 7, can be addressed. However, there is no specifics about where the necessary drainage is to be routed, or what flow capacity is needed. Because of the low gradients on this site, required storm drain cross sections are likely to be larger than normal. Moreover, if it materialises, flooding issues will be exacerbated by the neighbouring AB2 employment site. This is a significant factor limiting the effectiveness (deliverability) of development.</p> <p>In paragraph 13.45, the same arguments apply to paragraph 13.41 in regard to AB15. That is, will new patients be required to register with GP's surgeries elsewhere in the borough?</p> <p>Contrary to some verbal statements that have come from NuLBC to the effect that AB33 is not in use, cattle are often seen grazing on this site. This is another example of the kind of obfuscation tactics applied by this council to get certain sites accepted on the local plan. This is an open green space, with commercial agricultural value, backing on to properties at the eastern boundary. Therefore, any development on this site will represent an intrusion into the views looking westward from these properties.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due</p>



to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.

Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.

These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.

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<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP304
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

AB32(p75)

AB33(p75).

Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

RC8 (p76, 6 dwellings, potential flood risk.)

KS3 (p77)

LW53 (p77)

MD29 (p78, 150 dwellings, likely to conflict with HS2 construction?)

NC13 (p78)

NC77 (p78)

SP11 (p78, 900 dwellings, former Keele golf course)

SP12 (p79)

SP23 (p79)

TB19 (p79)

TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

TK10 (p80)

TK17 (p80)

TK27 (p80).

Other sites which may also be questioned are

KS17 (p77, would include loss of playing fields and other village amenities. This may be classed as infill.)

KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

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basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".
2. <https://www.communityplanningalliance.org/> (accessed 28/06/2023) Also on Facebook (<https://www.facebook.com/groups/4286629018013916>)
3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021> (accessed 11/07/2023)
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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)

References

Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.

Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP308
<b>Order</b>	174
<b>Title</b>	Kidsgrove and Ravenscliffe
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RC8

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

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Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

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Other sites which may also be questioned are

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The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this



basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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References

Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.

Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP312
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	NC13

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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<b>Comment ID</b>	NULLP318
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17

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One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

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The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

	<p>basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.</p> <p>The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.</p> <p>Yours sincerely Jim Austin</p> <p>Notes</p> <ol style="list-style-type: none"> <li>1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".</li> <li>2. <a href="https://www.communityplanningalliance.org/">https://www.communityplanningalliance.org/</a> (accessed 28/06/2023) Also on Facebook (<a href="https://www.facebook.com/groups/4286629018013916">https://www.facebook.com/groups/4286629018013916</a>)</li> <li>3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021">https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021</a> (accessed 11/07/2023)</li> <li>4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <a href="https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022">https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022</a> (accessed 11/07/2023), and for Wales, <a href="https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure">https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure</a> (accessed 11/07/2023).</li> <li>5. <a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro</a> (accessed 28/06/2023)</li> <li>6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)</li> </ol> <p>References</p> <p>Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.</p> <p>Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.</p>
<b>Comment ID</b>	NULLP293
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This Part of the Local Plan is neither justified nor effective. In these two respects, it is unsound. The reason this proposal cannot be justified is because the Borough claims that it only requires an extra 22 Ha of employment land through to 2040. Why then do they propose to take 80 Ha of good quality (3a and 3b) productive farmland from the green belt? NuLBC say they are making provision for 63 Ha of employment land (Policy PSD1, item 2) leaving 17 Ha for mitigation, which may be needed for support services such as a lorry park, substation and SuDS. When questioned on this, no clear answers were forthcoming. They are proposing to take 41 Ha of green belt land for no conceivable reason. On page 28 of their green belt site assessment, ED008, planning consultants Arup's final recommendation is to "Exclude site from process", due to its excessive impact on the green belt.</p> <p>Apart from not being justified, it is also not effective. That is, it cannot be delivered during the period of the plan. Access via the M6 or the A500 will require either a major upgrade of junction 16 or an extra junction, possibly light controlled, on the A500 just east of the junction 16 roundabout. The alternative narrow country lanes are entirely unsuitable for the extra traffic consisting mainly of 44 tonne, three axle heavy goods vehicles. It may be possible for emergency vehicles to access the site via these country lanes, maybe via Barthomley Road or Park Lane, however they would still need to negotiate the already busy roads through Audley. Future local employees at the site will mostly commute through the villages of Audley and Bignall End whose roads are already beyond capacity during rush hour. The necessary</p>

	<p>upgrade to junction 16 is unlikely to materialise within the plan period, given the vanishingly low prospects of central funding from Highways England. This is due in no small part to the £22 billion shortfall in the nation's finances discovered by the new Labour administration. It is for these reasons that the proposed employment site at AB2 is unsound.</p> <p>All of the allocations mentioned in this representation form part of a high growth strategy for which the NuLBC have provided no evidence that it will materialize.</p>
<b>Q7 Modification</b>	<p>In this draft local plan, the Borough are proposing an unprecedented transformation to the character of the Audley and Bignall End. One which is completely unjustified as far as local need is concerned. Due to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.</p> <p>These proposals here go completely against the essence of paragraph 4.3 of the local plan, dealing with "The Strategic Objectives for the Borough" (page 10), which "...will have respected and improved the character and distinctiveness of our market towns, villages, and other rural areas with a particular focus on broadening our network of Neighbourhood Plans." On the contrary therefore, the proposals here will completely destroy the character of the Audley and Bignall End as rural villages; the entire surrounding area having been completely urbanised. On this point at least the local plan can be considered wholly inconsistent.</p> <p>Many of the arguments against these proposals apply equally well to proposed green field developments elsewhere in the borough. It is hoped that the examiner will bare these in mind when considering other such proposals in this draft local plan.</p> <p>I am not sure whether the examiner will consider these points legitimate as far as planning is concerned. Most of the residents have no knowledge or experience of planning law. However, he/she can be assured that the majority of the residents of Audley and Bignall End are desperate to see these wholly destructive proposals removed from the local plan. The points made in this representation should be sufficient to render AB2, AB12, AB15 and AB33 unsound due to not being justified or effective. Therefore, I ask that these proposals be removed entirely from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP297
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>On the next two pages I address specific points which may further render the proposed development of AB12 unsound.</p> <p>Item 2 relates to access, particularly vehicular access via Diglake Street. This has already been considered on the first page dealing with AB12. Essentially, construction heavy vehicles will not be able to negotiate Diglake Street or Albert Street. The traffic density on these streets post development will more than double, which poses difficulties for emergency vehicles especially. The proposed emergency access on Ravens Lane is only 4.3 meters wide at its narrowest point. See paragraph 13.26 of supporting information. This renders the whole development effectively undeliverable.</p> <p>Item 4 addresses the visual amenity for residents adjacent to the site. The construction and completion will certainly constitute an intrusion onto the visual landscape. Therefore, the related statements in the local plan are false.</p> <p>Item 7 relates to retention of existing trees and hedgerows. While welcome, there can be no compensation for the loss of the soil leading a reduction of food production capacity and climate mitigation.</p> <p>Item 10 relates mainly to any flooding risk. Run-off from the developed site will be towards Brierly Brook to the north. This will compromise the agricultural quality of the field immediately north of the site. Brierly Brook is the lowest boundary descending gently to the west, delivering flood water eventually to the treatment plant on Alsager Road. Whether the brook has the capacity to cope with potential flash floods off AB12 remains to be seen. Moreover, any flash flooding will wash away high quality top soil of the adjacent field in the long term, which will compromise food production capacity and climate change mitigation.</p> <p>Item 12 deals with financial contributions for increased capacity of schools and health facilities. These costs are likely to consume much of the anticipated revenue that NuLBC hopes to gain from such developments. Knock on effects such as extra traffic will also contribute to already congested roads as well as increased noise and pollution.</p>
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to these considerations, and lack of effectiveness in some instances, especially the unjustified nature of AB2, the proposed sites AB2, AB12, AB15 and AB33 should be removed from the local plan.

Just as it is likely that an employment site at AB2 will create an employment/residential imbalance, it will boost the demand for further housing over and above what is already proposed. Conversely, it is also the case that the removal of AB2 from the plan would eliminate the need for housing at AB12, AB15 and AB33.

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<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP301
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

Loss of light or overshadowing

Increased risk of flooding due to ‘run-off’

Loss of visual amenity

Limitations to physical activity

Generation of extra traffic, overloading already busy local roads

Extra noise, pollution, disturbance and danger from increased traffic

Loss of trees and other biodiversity – bats, lizards etc.

Loss of natural carbon capture

Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

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The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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References

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<b>Comment ID</b>	NULLP305
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

Loss of light or overshadowing

Increased risk of flooding due to ‘run-off’

Loss of visual amenity

Limitations to physical activity

Generation of extra traffic, overloading already busy local roads

Extra noise, pollution, disturbance and danger from increased traffic

Loss of trees and other biodiversity – bats, lizards etc.

Loss of natural carbon capture

Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

AB32(p75)

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Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

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MD29 (p78, 150 dwellings, likely to conflict with HS2 construction?)

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TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

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TK17 (p80)

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Other sites which may also be questioned are

KS17 (p77, would include loss of playing fields and other village amenities. This may be classed as infill.)

KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

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References

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<b>Comment ID</b>	NULLP309
<b>Order</b>	180
<b>Title</b>	Policy KS3 Land at Blackbank Road, Knutton
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS3



**Q6 Details**

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References

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Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP313
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

AB32(p75)

AB33(p75).

Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

RC8 (p76, 6 dwellings, potential flood risk.)

KS3 (p77)

LW53 (p77)

MD29 (p78, 150 dwellings, likely to conflict with HS2 construction?)

NC13 (p78)

NC77 (p78)

SP11 (p78, 900 dwellings, former Keele golf course)

SP12 (p79)

SP23 (p79)

TB19 (p79)

TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

TK10 (p80)

TK17 (p80)

TK27 (p80).

Other sites which may also be questioned are

KS17 (p77, would include loss of playing fields and other village amenities. This may be classed as infill.)

KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this



basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

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<b>Comment ID</b>	NULLP311
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29

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Yours sincerely  
Jim Austin

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<b>Comment ID</b>	NULLP315
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

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- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Ignoring the 1.5 million surplus dwellings nationwide, the current (regulation18) draft of the local plan quotes a minimum housing requirement of 7160 in the Borough over the period 2020-40, of which 1206 are already completed. Of these, only 40% are to be 'affordable' (1-2 bedroom dwellings). Therefore, of the minimum requirement, only 2864 dwellings will be affordable. If we assume that those already built are affordable (they probably aren't) then the borough will only need 1658 homes built between now and 2040. This is because, due to being beyond affordability, most locals will be unable to buy or rent the other 60%. Therefore, they are not needed, and the proposed mix is entirely incompatible with general affordability. Given the surplus dwellings throughout England and Wales however, it is likely that none will be needed, especially considering the imminent removal of mandatory housing targets by the DLUHC under Michael Gove MP, and any specific affordable housing needs can be catered for by using brownfield sites only. All of the green areas in the local plan could therefore be planned in for their present use.

Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

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TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

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TK17 (p80)

TK27 (p80).

Other sites which may also be questioned are

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KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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References

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Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP319
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27

**Q6 Details**

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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<b>Comment ID</b>	NULLP316
<b>Order</b>	233
<b>Title</b>	Policy TB23 Land West of Galingale View, Thistleberry
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB23



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The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

Another statistic from the infographic is that nationwide we could build up to 1.2 million homes on brownfield sites (item 2)2,5. And like any other local authority, NuLBC is legally obliged to and does keep a register of its brownfield sites, although it is likely that some may slip through the net.

If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

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Other sites which may also be questioned are

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The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.

The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.

Yours sincerely  
Jim Austin

Notes

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5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.

Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP320
<b>Order</b>	184
<b>Title</b>	Policy KS17, Knutton Recreation Centre, Knutton Lane
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS17

**Q6 Details**

Newcastle under Lyme draft local plan – regulation 18: Consultation response

Dear Sir/Madam,

The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14). However, from a resident’s point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.

This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

- Loss of light or overshadowing

- Increased risk of flooding due to ‘run-off’

- Loss of visual amenity

- Limitations to physical activity

- Generation of extra traffic, overloading already busy local roads

- Extra noise, pollution, disturbance and danger from increased traffic

- Loss of trees and other biodiversity – bats, lizards etc.

- Loss of natural carbon capture

- Decrease in food production capacity

Increased local population placing further pressure on local schools, GP’s surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered “developed”, i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term ‘sustainable development’ an oxymoron.

One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment. Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic (“Housing crisis fact check”) from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current “housing shortage” is little more than a myth propagated by the construction industry and related interests. This is justified by item 3 on the infographic stating that “there are 1.5 million more dwellings than households” in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

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<b>Comment ID</b>	NULLP317
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10

**Q6 Details**

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Infographic from the Community Planning Alliance summarising UK housing stock in relation to the population.

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If there is an imperative, it is to increase further democratic control of the development process both locally and nationally. And both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors. In short, no new housing development is required, especially given that the borough has exceeded its housing targets in recent years. This calls into question the need for housing developments outside Audley Parish mentioned in the local plan. These include

BL18 (p75)

CT1 (p76, 750 dwellings)

RC8 (p76, 6 dwellings, potential flood risk.)

KS3 (p77)

LW53 (p77)

MD29 (p78, 150 dwellings, likely to conflict with HS2 construction?)

NC13 (p78)

NC77 (p78)

SP11 (p78, 900 dwellings, former Keele golf course)

SP12 (p79)

SP23 (p79)

TB19 (p79)

TB23 (p79, 124 dwellings, adjacent to Walley's Quarry.)

TK10 (p80)

TK17 (p80)

TK27 (p80).

Other sites which may also be questioned are

KS17 (p77, would include loss of playing fields and other village amenities. This may be classed as infill.)

KL13 (p77,93, part built already within the grounds of Keele University Campus).

The other class of developments locally is commercial. All too often we hear in the news from both local and Westminster sources, the mantra that economic growth is the imperative. But the actual imperative is stability, and we have reached the point where growth at any cost has become toxic, especially given the impossibility of unrestrained growth in a land of finite area. Have our political masters never heard of the circular economy?

Since the beginning of deindustrialisation in the 1980s, the diversity of employment opportunities has declined. We have seen an unhealthy move away from manufacturing/production of goods that we need as a nation, to one entirely reliant on trade with overseas partners, leaving us open to blackmail and the current spike of rampant imported inflation. Look what happened during lockdown. Over recent decades this has led to the demolition of old factories for residential developments and the rise of logistics centres (warehousing) for the temporary storage of imported goods, which will ultimately be operated by robots and AIs leading to even less employment. The problem with warehousing of course is its large consumption of land area. My question is, what is the driver for the proposed "big box" developments on AB2 and TK30 locally? Both of these proposals lie entirely within the greenbelt, although the TK30 land has already been quarried in parts. Neither of these proposals is either desirable or needed. However, if we are forced to accept one or the other then TK30, being about 5% smaller, is the lesser of two evils. With the green light given to the development of the 44 Ha Chatterley Valley site on Peacock Hay Road, and the numerous empty warehouses existing across the potteries, North Staffordshire and Cheshire East. It is dubious to say the least to claim that either AB2 or TK30 are needed. These sites are 70 Ha and 66 Ha respectively. However, in the recently published "Housing and Economic Needs Assessment Update", the borough as a whole only needs a maximum of 34 Ha6. So why are we saddled with 154 Ha total covered by AB2, TK30 and KL15?

If the local plan caters for agricultural developments, AB2 and TK30 could be planned for their existing use. The majority of the area covered by these sites is high grade (3a) agricultural land. In the case of TK30 the quarried areas could be reclaimed for agriculture or, if this proves difficult, used in other ways to enhance biodiversity. If the land in question is council owned, and the motivation is to sell off council assets, then once sold, they cannot be sold again, and any control is lost. Moreover, once farmland is developed for other purposes then it is near to impossible for it to be reclaimed later for that use – and so the ratchet inexorably turns. On this

	<p>basis therefore, I would urge the LPA to remove the warehousing proposals AB2 and TK30 from the local plan.</p> <p>The purpose of this consultation is to supply feedback to the Borough Council. Another question is, does Westminster similarly consult with local authorities on planning issues, or is there any other mechanism where local councils can supply feedback to Westminster, providing a better feel for the mood of the nation? If so, why do we not see a root and branch reform of the NPPF rather than the tinkering around the edges approach seen in the July 2021 version? Most especially, there should be a removal of paragraphs 11-14 and its supporting statements elsewhere in the document, which is tantamount to a developer's charter. And there should be more flexibility within the NPPF allowing local plans to include parcels of land for their current purpose, given that there is almost none in this country that is not currently in use. As far as I can see this plan is nowhere near compatible with efforts required to address the current climate crisis. Moreover, given their scale, the proposed developments represent too greater shock to the environment and local communities over the short 20-year period suggested for their completion. And with the sufficient housing and unused commercial sites we already have, there is no need for any encroachment into our green spaces.</p> <p>Yours sincerely Jim Austin</p> <p>Notes</p> <ol style="list-style-type: none"> <li>1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".</li> <li>2. <a href="https://www.communityplanningalliance.org/">https://www.communityplanningalliance.org/</a> (accessed 28/06/2023) Also on Facebook (<a href="https://www.facebook.com/groups/4286629018013916">https://www.facebook.com/groups/4286629018013916</a>)</li> <li>3. 24.8 million households in England and Wales. "Household and resident characteristics, England and Wales", <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021">https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/householdandresidentcharacteristicsenglandandwales/census2021</a> (accessed 11/07/2023)</li> <li>4. 24.9 million dwellings in England and 1.4 million dwellings in Wales. "Housing supply: net additional dwellings, England: 2021 to 2022", <a href="https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022">https://www.gov.uk/government/statistics/housing-supply-net-additional-dwellings-england-2021-to-2022/housing-supply-net-additional-dwellings-england-2021-to-2022</a> (accessed 11/07/2023), and for Wales, <a href="https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure">https://stats.wales.gov.wales/Catalogue/Housing/Dwelling-Stock-Estimates/dwellingstockestimates-by-localauthority-tenure</a> (accessed 11/07/2023).</li> <li>5. <a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro</a> (accessed 28/06/2023)</li> <li>6. The ENA recommends a further 21-34 Ha of warehousing space over the period up to 2040. See page 37, paragraph 5.41, "Housing and Economic Needs Assessment Update", Newcastle under Lyme, Turley, (2023)</li> </ol> <p>References</p> <p>Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.</p> <p>Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.</p>
<b>Comment ID</b>	NULLP321
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Family Name</b>	Austin
<b>Consultee Given Name</b>	Jim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>Newcastle under Lyme draft local plan – regulation 18: Consultation response</p> <p>Dear Sir/Madam,</p> <p>The following is a robust objection to all developments on green field sites covering all the proposals within Audley Parish and many more elsewhere as recommended in the draft local plan. In writing this response, I am aware of the need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. This requirement appears to be a symptom of the subsection in the NPPF titled "The presumption in favour of sustainable development" (paragraphs 11-14). However, from a resident's point of view, this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed. This is, in essence, a commitment to eventual development even if it is not needed. And this is a source of great anxiety amongst residents that undesirable development is out of control, a situation clearly being fuelled by the existence of paragraphs 11-14. On this basis therefore, this subsection of the NPPF needs to be challenged.</p> <p>This response may differ from others in that it comments on local planning within a strategic context. As I see it, there are three main types of development, which are likely to blight the future generations in the UK: (i) infrastructure (example, HS2), (ii) commercial (examples, AB2 and TK30 in the NuLBC local plan) and (iii) residential (example, recent housing developments either side of the A513, Beaconside, Stafford). Infrastructure is within the remit of Westminster rather than local authorities, so that is not a particular concern here. My main focus is</p>

encroachment of developments, both residential and commercial, in green spaces allowed for in the draft local plan. And any new developments in rural areas will, at the very least, result in:

Loss of light or overshadowing

Increased risk of flooding due to 'run-off'

Loss of visual amenity

Limitations to physical activity

Generation of extra traffic, overloading already busy local roads

Extra noise, pollution, disturbance and danger from increased traffic

Loss of trees and other biodiversity – bats, lizards etc.

Loss of natural carbon capture

Decrease in food production capacity

Increased local population placing further pressure on local schools, GP's surgeries and other services, which are already oversubscribed.

The United Kingdom as a whole is currently gripped by a pandemic of overdevelopment, which threatens nature and the already depleted biodiversity we see in this country. And it has now reached the stage where it should be considered a national emergency. I for one, do not feel that I have any influence over the shape of our surroundings. There are numerous drivers for this trend many of which are not being addressed by government at any level. At the heart of this is a significant disconnection between the opinions of politicians and public as to what is actually needed. There appears to be cross-party support for activities driving economic growth at all costs, irrespective of the consequences to the natural environment. Aggravating this divide is the aforementioned paragraphs 11-14 of the NPPF. At a local level, what is not in doubt, is that whenever there is land removed from the green belt there is rarely, if ever, an equivalent area so returned, so the process is irreversible. And in the absence of any agreed lower limit on the area of protected green spaces within the UK, no release of green belt land, or development on green spaces, can be considered sustainable. Unless, of course, the use of agricultural land for just that purpose is also considered "developed", i.e. it has an economic and sustainable use. And the local plan does appear to acknowledge this<sup>1</sup>, so why not include agricultural use into the local plan implying no change in particular areas? If this is not the case, we are committed to a process where the end point is a UK completely covered in tarmac

and concrete. Anyone arguing against this interpretation needs to state and justify precisely where that end point is. If they cannot, this renders the term 'sustainable development' an

oxymoron. One particular trend of major concern is the growing UK population. At the time of writing this stands at just under 69 million, and is set to reach 74 million before 2050. Studies in the US (Pimental and Giampietro, 1994; Lal, 1989) suggest that comfortable/sustainable living requires 0.5 Ha (1.2 acres) per capita. If we are generous, sustainable living in the UK was possible with a population of 57 million, a figure I remember from the late 1960s. With a total area of the UK at just over 60 million acres, a land area of one acre per capita for sustainable living in the UK seems feasible. As we have seen, anything more puts a strain on the environment as a whole. On this basis therefore, the UK is currently overpopulated by about 15%, and there appears to be no initiatives to address this issue. On this point, Westminster appears to be in a state of denial, thus fuelling the current avalanche of overdevelopment nationwide. Residential developments have a knock on effect by requiring other types of development to provide infrastructure, services and employment.

Notwithstanding overpopulation, this gives the impression that there is not enough housing stock to accommodate the current population. Recent data, in the form of an infographic ("Housing crisis fact check") from the Community Planning Alliance<sup>2</sup>, convincingly shows that this is far from the case. In short, what is perceived as the current "housing shortage" is little more than a myth propagated by the construction industry and related interests.

This is justified by item 3 on the infographic stating that "there are 1.5 million more dwellings than households" in England and Wales alone<sup>3,4</sup>. On this basis therefore, no further house building is needed in the UK subject to efforts addressing projected population growth. In other words, what we have at present is a substantial housing surplus. Therefore, locally there are strong grounds for objections to development of the sites

AB12(p74)

AB15(p75)

AB32(p75)

AB33(p75).

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Yours sincerely

Jim Austin

Notes

1. Newcastle under Lyme draft Local Plan (Regulation-18), Policy PSD 4: Items 4-6, p21, 2023. E.g. item 4a: "Development that has an operational need for a countryside location such as agricultural, forestry or essential farming operations".

2. <https://www.communityplanningalliance.org/> (accessed 28/06/2023) Also on Facebook (<https://www.facebook.com/groups/4286629018013916>)
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  5. [https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS\\_SEYJD5xDUUwnN9wQsrH7iro](https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/?fbclid=IwAR3HihHHSv83kzw4IfNS-Q5K9HWpML8BZS_SEYJD5xDUUwnN9wQsrH7iro) (accessed 28/06/2023)
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- Lal R, (1989), "Land degradation and its impact on food and other resources", In: D Pimentel (Ed.), "Food and Natural Resources", pp. 85-140, Academic Press, San Diego.
- Pimentel D and Giampietro M, (1994), "Food, Land, Population and the U.S. Economy", Carrying Capacity Network.

<b>Comment ID</b>	NULLP439
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Axon
<b>Consultee Given Name</b>	S
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>To whom it may concern,</p> <p>I would like to comment as part of the consultation process for 2020 -2040.</p> <p>I realise the need for housing but have objection to the plan for land SP11 (4) and SP23 for use for homes.</p> <p>The impact on local space wildlife and bluebell woods does not appear to of been considered regarding the negative impact building ,increased footfall and loss of space access for local residents.the impact in reducing wildlife forna and flora and wellbeing.</p> <p>Taking up space used by us locally does not improve my or others lives or that of nature.</p> <p>I would think that the allotments and back lane will change negatively due to this increase in people... wildlife .space that has traditionally being public space given over to development.</p> <p>I have concerns for the Blue bell woods and hope whole heartedly that the plea to keep this safe is understand, that this exercise of consultation is undertaken to listen to understand , not listening to respond.</p> <p>It will be interesting to see if the mix of social and private development is considered also.</p> <p>I would propose that the country park area is moved to the SP11 and SP23 areas to protect the woods and keep the back lane area and allotments and wildlife that frequents these areas and the bluebells protected .</p> <p>SP11 AND SP23 moving across into the other spaces.</p> <p>Children and locals use the lane for dog walking and safe no traffic space, .especially the elderly as it has a flat easily accessed walkway.They use this daily .</p> <p>Making this a road with traffic will alienate this group who need a flat surface (not grassed fields) to walk on to keep mobile and enjoy back lane like the rest of us local residents.</p> <p>The small right of way coming through to the racecourse appears to cut through the semi detached houses round the back , this may hopefully a wrong interpretation on the map.i think this is a private access road for residents</p> <p>Please consider the concerns. I do hope other feedback mirrors mine.</p> <p>Thank you for the opportunity.</p> <p>Let's hope active listening occurs and the understanding that to improve wellbeing and newhomes is not at the expense of reducing that of existing residents and the surrounding nature.</p>
<b>Comment ID</b>	NULLP440
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Axon
<b>Consultee Given Name</b>	S
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
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<b>Comment ID</b>	NULLP1147
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Ayling
<b>Consultee Given Name</b>	John Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CH3
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>a. Legally compliant no ?</p> <p>6. POLTCIES CH3 / PSD1 / SE 9 AND 10 May Bank Allocation , Cross Heath (CH 3)</p> <p>Planning Permission 20IOL078,I OUT Granted on appeal to Staffordshire County Council subject to conditions including layout,access, drainage and reservation for heritage reasons. Because of uncertainty this site should not be included in the plans housing availability Proposals. ( POLICY PSD1 ) see sheet 2.</p> <p>POLICY SE 9 and 10 list sites in the plan area which have special historical and /or landscape features which require protection . I propose that the views along Milehouse Road and Chapel Lane, ancient highways into the doomsday settlement of Wolstanton be included.</p> <p><b>ADDITIONAL INFORMATION</b> <b>MAY BANK, ALLOCATION , CROSS HEATH.</b> This site ,referred to as Balls Yard is believed to have been given to the local Council, then Wolstanton United Urban District Council , then the Education Authority in the 1930s. Since then it has lain undeveloped . It has been shown on Heritage Maps as containing a Roman Aquifer and being on the line of the Roman Road between Chester and Uttoxeter.</p> <p>For these reasons the INSPECTOR at the Appeal placed a Planning condition on his decision that these restrictions on any development should be investigated by a desk study or Site investigation agreed <b>with the Borough Council who opposed the application.</b> Development should also preserve and enhance non- <b>Designated heritage assets and their settings in accordance with POLICY SE9. and SE10</b></p> <p>Incorrect reasons were given by the Staffs C.C Planning Consultants to support the loss of open space . The 30 Acre Wolstanton Marsh has been owned by the Duchy of Lancaster since 1267 and no development can take place . <b>This acreage cannot be used in the calculations of the adequacy of open space in other wards of the Borough.</b></p> <p>Staffordshire County Council as applicant , not the L.P.A carried out a consultation of the residents of the houses fronting Hoon Avenue and Milehouse Lane . The main Issues raised were the traffic generated by the 1200 Pupil Orme Academy and the additional generation from the proposed development. The County Council ,as Highway Authority were unable to to recommend satisfactory road access to the site for the Indicative layout for development</p> <p>The residents also considered that the part of the site Fronting Hoon Avenue was low lying and flooded. The I Main CROSS Borough Trunk Sewer also restricts building on the site. The Inspector attached a condition that a solution to the drainage issue must be approved by the L.P.A before the development takes place.It is understood that the Staffs County Council do not intend to develop this site themselves although they are a Housing and Heritage Authority. And may already have sold the site to a private housing developer to increase Their capital assets.</p> <p>There is a shortage of social and affordable housing in The Borough which could be met on this site. Housing to be provided by Aspire Housing or Housing Associations is governed by the availability of capital</p> <p>This site should be reserved in the Local Plan for Social and specialised housing . The design , layout and Landscaping of this site should take into account the Heritage Policies. Parking and traffic generation less. For the above reasons the site CH3 , although it has a a conditional permission should be excluded from the calculation of available sites.</p> <p>CH3 is one of several sites which passed into the Ownership of Staffordshire County Council in the Borough as Education Authority. and now have Planning Permission for private housing development, not through a development plan allocation. These Include St Wustans Estate and its extension in Wolstanton { playing fields for Ellison Street School }, Land north of Bradwell Hospital ( former Bradwell Secondary School Playing Field ) now under Construction but with road access and transport issues The Orme academy now has L200 pupils and hence provides the replacement playing field and creates increased traffic generation at peak times The Staffordshire County Council and private Consultatants carried out limited consultation on CH3 but as the highway authority should have consulted the school Academy and a wider area affected by the school traffic generation or waited for the local plan consultation.</p> <p>I am requesting that these observations be published on line and copied to Staffordshire County Concl. I am also requesting in relation to Policy Ch3 and PSDI that I Be invited to take part in the panel discussion</p>



	<p>at the Local Plan Enquiry into the allocation requirements for housing in the 2nd Draft Local Plan due to my local knowledge and Experience.</p> <p><b>Submitted as a resident of Wolstanton for 50 years, a member of the Electoral Role of St Margaret's Church, Wolstanton and voluntary groups.</b></p> <p><b>Responsible for the preparation of the former Draft Local Plan in 1995 as Deputy Planning and Development Officer. Currently a member of the West Midlands Advisory Committee of the Royal Town Planning Institute.</b></p>
<b>Q9 Hearing reasons</b>	<p>I am also requesting in relation to Policy Ch3 and PSDI that I be invited to take part in the panel discussion at the Local Plan Enquiry into the allocation requirements for housing in the 2nd Draft Local Plan due to my local knowledge and Experience.</p>

<b>Comment ID</b>	NULLP1385
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Baddeley
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1444
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Baddeley
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments:</p> <p>I am very saddened and filled with despair at the prospect of more open space/ green belt land being lost forever, replaced with yet more housing, industry, warehousing etc</p> <p>I am fourth generation to reside in Red Street and in my life time I have seen fields and open land disappear to be replaced by High Carr and Parkhouse Industrial Estates, Waterhayes, Mitchels Wood, Fresian Heights, Badgers Croft and the newly constructed Wedgewood view (off deans lane). Housing developments.</p> <p>In my view I think Red Street has had more than its fair share of fields and land being turned into industry and housing already. Please do not takeaway any more greenfields and land off us. Leave us be.</p> <p>Also, I live (redacted by admin) and at times due to high volumes of traffic using Crackley Bank its very difficult to get our car in/out of our drive and if the plan to build all of the extra housing goes ahead the amount of traffic using Crackley Bank, Red Street will be unbearable for existing residents</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

## Bagguley, Dennis

<b>Comment ID</b>	NULLP144
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Bagguley
<b>Consultee Given Name</b>	Dennis
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Proposals for consideration</p> <ol style="list-style-type: none"> <li>1. Proposal - Improvement to Road Junctions in Ravens Lane The junction of Ravens Lane and Diglake Street is the site of a school crossing with a crossing warden. This is an extremely busy location for traffic as there are three road junctions nearby connecting with Ravens Lane- Diglake Street; Chapel Street; and Albert Street.</li> <li>2. Proposal for A Service Road A 'service road' behinds the houses on the east side of Diglake Street and behind the houses on the north side of Ravens Lane to the north side of Hope Street would enable residents to park their cars off-road and close to their houses.</li> <li>3. Proposal for Double Yellow no parking lines Where a service road is provided, double yellow no parking line to be painted on Ravens Lane, Diglake Street and Hope Street to enable easy access to the site.</li> <li>4. Proposal for No Parking Provision Provision to a parking area will only be for residents (and their visitors) who live in the houses backing onto the fields on Ravens Lane, Diglake Street and Hope Street.</li> <li>5. Proposal for Sewerage Improvement Provision of sub station for sewerage and waste water before it goes into main drain.</li> </ol>
<b>Q10 File 1</b>	6384140
<b>Attachments</b>	<a href="#">1363467 Dennis Bagguley diagram .pdf</a>



<b>Comment ID</b>	NULLP214
<b>Order</b>	112
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	11.28/11.31
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The Council Playing Pitch Strategy (PPS) Stage E review identifies that there is a need to undertake a new PPS with a particular focus on football and cricket due to significant changes in supply and demand since the PPS was published in 2020.</p> <p>Sport England note the commitment to a new PPS though this will not occur until 2025 (12 months to produce), despite the need for doing this work being identified prior to this local plan consultation and the plan itself allocating sites which would result in the loss of playing field sites. At this point in time no discussions have taken place with Sport England and relevant sporting national governing bodies with regards to the brief of the work in line with Sport England Playing Pitch Strategy Guidance.</p>
<b>Q7 Modification</b>	<p>Sport England consider that the Council demonstrate a commitment to delivering a new Playing Pitch Strategy (PPS) by commissioning the work prior to 2025 and there being a clear timeframe for its delivery in line with Sport England's PPS guidance.</p> <p>It is vital that an up to date PPS is undertaken as it should inform the Local Plan in line with NPPF paragraph 102. The evidence based document will also either support the proposed allocation resulting in the loss of playing field land or demonstrate the need for replacement playing field provision, which could be allocated through the plan or it being a clear policy requirement.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP218
<b>Order</b>	180
<b>Title</b>	Policy KS3 Land at Blackbank Road, Knutton
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The allocation is unsound as currently drafted with no replacement provision proposed in line with SE6 and it not being demonstrated that the site is surplus to requirement.</p> <p>The site has been marked out for playing pitches and has been utilised by community football teams within the last five years. The site (Blackbank) is identified within the Council's Playing Pitch Strategy (PPS) with a site recommendation that it should be protected and enhanced. The PPS also identifies that within the urban Newcastle north,south and central analysis area, where the site is located within, there are current shortfalls in football, rugby, and cricket ,which are exacerbated when taking account of future demand.</p> <p>As identified, within the Council's Playing Pitch Strategy Stage E update there has been growth in football and cricket which could further exacerbate demand for playing pitches from that previously identified within the PPS 2020. Similarly, the Council's Infrastructure Development Plan identifies the need for additional pitch provision.</p> <p>As such, should the allocation be retained, there should be a criteria for policy requiring that the site is replaced in line with the requirements of Policy SE6.</p>

<b>Q7 Modification</b>	Should the allocation be retained a criteria should be inserted into policy KN3 requiring that the playing field site is replaced in line with the requirements of Policy SE6, ensuring that the allocation is justified and consistent with NPPF paragraph 103.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP212
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The proposed allocation is adjacent to Newcastle Golf Club as such the development should be appropriately designed so that it would not prejudice the use of the sports facility or place unreasonably restrictions on the facility in line with NPPF paragraph 187.</p> <p>As such, a criteria should be inserted into policy TB19 ensuring that a ball strike risk assessment should be undertaken and any mitigation identified as being required then this should be implemented before any impact on the golf club.</p>
<b>Q7 Modification</b>	To ensure that the policy is consistent with NPPF paragraph 187 a criteria should be inserted into policy TB19 ensuring that a ball strike risk assessment should be undertaken and should any mitigation be identified as being required then this should be implemented before any impact on the golf club.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP211
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	4.12 SO-9
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Sport England welcomes the principal of objective SO-9 (IX) in supporting physical activity, including sport and recreation. However, it is unclear why the objective continues to state "maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages, one of the Borough's greatest unique assets to help enhance health and wellbeing".</p> <p>Sport England are unclear if there is a hierarchy for the protection of spaces? Why are green corridor linkages only being sought to be improved? Why does the objective only relates to the urban area as rural open spaces also play an important role in enhancing health and wellbeing.</p>
<b>Q7 Modification</b>	<p>Sport England considers that the objective would be more effective if the wording is amended to:</p> <p>"maintain and improve the wide variety of open spaces and green corridor linkages, one of the Borough's greatest unique assets to help enhance health and wellbeing"</p> <p>The proposed wording will recognise the importance of open spaces across the Borough which through the protection and improvement will help enhance health and wellbeing.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP215
<b>Order</b>	32

<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Sport England are supportive of the reference to Active Design within Policy PSD6 and its supporting text. However, Sport England considers that the decision maker should assess how proposals would follow the Active Design Principles.</p> <p>Sport England therefore considers that the policy would be more effective by requiring the applicant to demonstrate how new developments follow the Active Design Principles through the submission of a completed Active Design checklist (link provided below).</p> <p><a href="#">https://portal.south-east.gov.uk/2023/09/20/active-design-checklist/</a> Pg 36, PS4, 47N</p>
<b>Q7 Modification</b>	<p>To ensure that the new developments follow the Active Design Principles, there should be a requirement that the applicant should submit a completed Active Design checklist demonstrating how the principles.</p> <p>A link to the Active Design checklist is provided below:</p> <p><a href="#">https://portal.south-east.gov.uk/2023/09/20/active-design-checklist/</a> Pg 36, PS4, 47N</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP219
<b>Order</b>	112
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	11.30
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Sport England notes that the policies map identifies open spaces from the Open Space and Green Infrastructure Strategy (2022) and sites considered through the Playing Pitch Strategy (2020). However, it should be noted that not all playing field sites have been included with some current/former school playing field sites not being identified within the map.</p> <p>For the avoidance of doubt Sport England seeks clarity that Policy SE6 relates to all open space and playing field sites including the proposed allocations made within the plan, and not just those identified on the policies map.</p> <p>This is particularly pertinent as it might be implied that those sites not identified on the policies map (including proposed allocations) are surplus to requirement even though there has been no submissions demonstrating that this is the case in line with NPPF paragraph 103.</p>
<b>Q7 Modification</b>	<p>Sport England seeks clarity that Policy SE6 relates to all open space and playing field sites including proposed housing allocations on playing field sites, not just those identified on the policies map. This is particularly pertinent as it might be implied that those sites not identified on the policies map (including proposed housing allocations) are surplus to requirement even though there has been no submission demonstrating that this is the case in line with NPPF paragraph 103.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP216
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Sport England

<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Sport England notes that the Infrastructure Delivery Plan (IDP) makes reference to Green and blue Infrastructure, open space and sports though policy IN1 only refers to Green Infrastructure and maintenance.</p> <p>Sport England therefore consider for consistency the wording in Policy IN1 should be amended to align with the IDP.</p>
<b>Q7 Modification</b>	To ensure consistency between the IN1 and Infrastructure Delivery Plan (IDP) point 5 Green Infrastructure should be amended to Green and blue Infrastructure, open space and sports.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP220
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The allocation is unsound as currently drafted with no replacement provision proposed in line with SE6 and it not being demonstrated that the site is surplus to requirement.</p> <p>The site has historically been marked out for playing pitches and the PPS also identifies that within Kidsgrove analysis area, where the site is located within, there are current shortfalls in football and cricket ,which are exacerbated when taking account of future demand. As identified, within the Council's Playing Pitch Strategy Stage E update there has been growth in football and cricket from that previously identified within the PPS 2020, which could exacerbate shortfalls in demand. Similarly, the Council's Infrastructure Development Plan identifies the need for additional pitch provision.</p> <p>Whilst noting criteria 8 states the retention and improvement of playing pitches, with appropriate ancillary facilities for football use, there will be a loss of playing field provision with site having been marked out for more than two playing pitches, marked out in circa 2011, which were identified within the Council's PPS. Further to this there is no clarity of the playing pitch improvement and ancillary provision proposed.</p> <p>As such, should the allocation be retained, there should be a criteria for policy requiring that the site is replaced in line with the requirements of Policy SE6.</p>
<b>Q7 Modification</b>	Should the allocation be retained a criteria should be inserted policy BL18 requiring that the playing field site is replaced in line with the requirements of Policy SE6 to ensure that the allocation is justified and consistent with NPPF paragraph 103.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP213
<b>Order</b>	220
<b>Title</b>	Policy TK6 Site at Coalpit Hill Talke
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	TK6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The allocation is unsound as currently drafted with no replacement provision proposed in line with SE6 and with it not being demonstrated that the site is surplus to requirement.</p> <p>The site has historically been marked out for playing pitches and the PPS also identifies that within Kidsgrove analysis area, where the site is located within, there are current shortfalls in football and cricket ,which are exacerbated when taking account of future demand. As identified, within the Council's Playing Pitch Strategy Stage E update there has been growth in football and cricket from that previously identified within the PPS 2020, which could exacerbate shortfalls in demand. Similarly, the Council's Infrastructure Development Plan identifies the need for additional pitch provision.</p> <p>As such, should the allocation be retained, there should be a criteria for policy requiring that the site is replaced in line with the requirements of Policy SE6.</p>
<b>Q7 Modification</b>	Should the allocation be retained a criteria should be inserted into policy TK6 requiring that the playing field site is replaced in line with the requirements of Policy SE6, ensuring that the allocation is justified and consistent with NPPF paragraph 103.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP217
<b>Order</b>	184
<b>Title</b>	Policy KS17, Knutton Recreation Centre, Knutton Lane
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS17
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The proposed allocation contained an artificial playing pitch, four court MUGA and a football pitch.</p> <p>The allocation is unsound as currently drafted with no replacement provision proposed in line with SE6 and with it not being demonstrated that the site is surplus to requirement.</p> <p>As such, should the allocation be retained, there should be a criteria inserted in policy KS17 requiring that the site is replaced in line with the requirements of Policy SE6.</p>
<b>Q7 Modification</b>	To ensure that the policy is consistent with NPPF paragraph 187 a criteria should be inserted into policy TB19 ensuring that a ball strike risk assessment should be undertaken and should any mitigation be identified as being required then this should be implemented before any impact on the golf club.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP221
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Company / Organisation</b>	Sport England
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Bahey
<b>Consultee Given Name</b>	Rajvir
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Sport England considers that Policy SE6 point 4 is not consistent with National Planning Policy Framework (NPPF) paragraph 103 (a). This is due to the policy not allowing for the loss of existing open space,



	<p>sports and recreational buildings and land, including playing fields, following an assessment being undertaken which has clearly shown the open space, buildings or land to be surplus to requirements.</p> <p>It is noted that the supporting text for the policy, paragraph 11.33, seeks the submission of evidence where a facility is no longer meeting the needs of the community. However, this is not a policy requirement and the wording is not consistent with NPPF paragraph 103 (a).</p>
<b>Q7 Modification</b>	<p>SE6 point 4 should include a criteria consistent with NPPF paragraph 103 (a) and the policy supporting text at paragraph 11.33 seeking the submission of evidence where a facility is no longer meeting the needs of the community, should be removed.</p> <p>These proposed changes would ensure that the policy would be consistent with rNPPF paragraph 103.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP419
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Cholmondeston and Wettenhall Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Bailey
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Barthomley Parish Council joins with Weston and Basford Parish Council in objecting strongly to the proposed Newcastle under Lyme Local Plan for a large strategic employment allocation on land abutting the SE side of junction 16 of the M6.</p> <p>It is the view of the Parish Council that without a strategy in place to cover the development of the A500 and its surrounding areas involving all major stakeholders, the proposals will be unsustainable and will create additional traffic thereby impacting negatively on the infrastructure of roads and other facilities in and around Barthomley as well as creating pollution and increases in the number of journeys undertaken in the area.</p> <p>The Parish Council notes that the area is within the North Staffordshire Green Belt and there is no justification for using it when there are many brownfield sites available which could be used instead. The Newcastle under Lyme Local Plan identifies (in section 5.13) that there is "potentially a sufficient amount of employment land to sustain the proposed growth in the plan period" and (in Sections 8.7 &amp; 8.8) describes how the greenbelt will be protected. Section 11.8 identifies land/sites such as Chatterley Valley, Etruria Valley, Festival Park and Trentham Lakes which will all serve to provide sites to fulfil requirements, and conversely add to the traffic problems at Junction 16. Bearing this in mind it is not possible for all the exceptional circumstances to be met when considering development on greenbelt.</p> <p>Removal of green belt land for warehousing development would run counter to the UK's carbon net zero strategy. In the current Core Spatial Strategy for Newcastle under Lyme and Stoke on Trent, it states that 'the Council will take a positive approach towards rural enterprise relating to the availability of the local workforce. In particular opportunities will be sought to encourage:</p> <ul style="list-style-type: none"> <li>• The sensitive and sustainable diversification of traditional rural economies</li> <li>• Positive contribution towards enhancing local landscape and biodiversity'</li> </ul> <p>Releasing green belt land to be used for warehousing seems to run directly against these principles. Indeed, Newcastle under Lyme's own assessment of potential sites (page 2) says that the site could be considered for employment use, but that "development would however represent a significant encroachment into the countryside and therefore removal of the site from the Green Belt could harm the overall function and integrity of the Green Belt."</p> <p>To summarise, Barthomley Parish Council wholeheartedly supports both the submissions made by Audley Parish Council and Weston &amp; Crewe Green Parish Council and makes the point made by these councils that the previous consultation exercise appears to have been completely ignored, rendering the exercise pointless.</p>
<b>Q10 File 1</b>	6387217
<b>Attachments</b>	<a href="#">NUL BC Local Plan Junction 16 developments comments 7.10.24.pdf</a>

<b>Comment ID</b>	NULLP9
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Bailey
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I feel the need to express my concerns, frustration and anger over the building of 125 houses on the plot AB 12 Diglake Street.</p> <p>Firstly, Green belt land is green belt to protect it.</p> <p>Diglake street is also a very small street of terraced houses, barely wide enough to get one car down at a time, how do you imagine extra traffic for 125 extra houses to enter and exit from here? Many families now owning 2 cars or more, an extra 250 cars in a very small street. This really hasn't been thought about.</p> <p>Also, the main Road Ravens Lane has cars double parked either side of the road now, allowing only one car at a time though at a time and that's a main road!</p> <p>Maybe a solution being double yellow lines but this just moves the problem, people need to park, it's the extra volume of traffic!</p> <p>Has anybody actually been to see the proposed site? Surely, they can see it's just not easily possible.</p> <p>We also have an issue with infrastructure, if we can't get a dentist or doctor's appointment now, how does building further homes in the area help this?</p> <p>Not to mention the loss of wildlife, the homes of birds of prey also living in the area.</p> <p>You really should be ashamed of yourselves.</p>

<b>Comment ID</b>	NULLP11
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Bailey
<b>Consultee Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I am a resident of (Redacted by admin), looking out to where you propose to build.  I'm going to keep this short and sweet.  Firstly, you intend to take away natural beauty of our area.  Secondly, what plans do you have for the infrastructure of the parish/village?  The village is already full and you propose to bring more people into the parish/village.  The heritage of this country is slowly slipping away, can't you see that?</p>

<b>Comment ID</b>	NULLP269
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	The British Horse Society
<b>Consultee Family Name</b>	Bannerman
<b>Consultee Given Name</b>	Wendy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p>Dear Local Plan Team</p> <p>Reg 19 Local Plan Newcastle-under-Lyme</p> <p>The response below is from the British Horse Society however our volunteers in the county may also respond at a local level.</p> <p>Overall</p> <p>The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – only 16.4% in Staffordshire - and are increasingly forced to use busy roads to access them.</p> <p>Between 01.01.2023 – 31.12.2023 nationally:</p> <ul style="list-style-type: none"> <li>• 3,345 road incidents involving horses have been reported to The British Horse Society</li> <li>• Of these, 50 horses have died and 77 have been injured</li> <li>• 3 people have died, and 94 people have been injured because of road incidents</li> <li>• 23% of riders were victims to road rage or abuse</li> <li>• 82% of incidents occurred because a vehicle passed by too closely to the horse</li> <li>• 79% of incidents occurred because a vehicle passed by too quickly</li> </ul> <p>'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s104).</p> <p>DEFRA has recorded a population of 755 horses in the ST5 postcode area (2021). The contribution per horse to the economy, according to BETA (2023), is £6,887, therefore in this case a contribution of £5,199,685 per annum. Equestrian activities in semi-rural areas (bring your horse on holiday, pleasure rides, competitions) are increasingly popular in addition to established activities such as schooling and hacking. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liveries, etc). Promoting, nurturing and enabling equestrian access would support the equestrian industry.</p> <p>IN1 and IN2 Infrastructure and Transport</p> <p>Where there are opportunities identified to make existing footpaths useable for cyclists or new paths connecting the network, these should be multi-user routes for all vulnerable road users, including equestrians. Crossings/bridges/underpasses should be designed to include equestrians (eg 'pegasus crossings'). Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already shared by cyclists and other user groups. For maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new cycle paths should be shared with other user groups. The provisions will futureproof the routes and engage a wider range of users in active travel and leisure which in turn will impact positively on health and wellbeing and road safety statistics.</p>
<b>Comment ID</b>	NULLP270
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Company / Organisation</b>	The British Horse Society
<b>Consultee Family Name</b>	Bannerman
<b>Consultee Given Name</b>	Wendy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2



<b>Q6 Details</b>	<p>Dear Local Plan Team</p> <p>Reg 19 Local Plan Newcastle-under-Lyme</p> <p>The response below is from the British Horse Society however our volunteers in the county may also respond at a local level.</p> <p>Overall</p> <p>The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – only 16.4% in Staffordshire - and are increasingly forced to use busy roads to access them.</p> <p>Between 01.01.2023 – 31.12.2023 nationally:</p> <ul style="list-style-type: none"> <li>• 3,345 road incidents involving horses have been reported to The British Horse Society</li> <li>• Of these, 50 horses have died and 77 have been injured</li> <li>• 3 people have died, and 94 people have been injured because of road incidents</li> <li>• 23% of riders were victims to road rage or abuse</li> <li>• 82% of incidents occurred because a vehicle passed by too closely to the horse</li> <li>• 79% of incidents occurred because a vehicle passed by too quickly</li> </ul> <p>'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s104).</p> <p>DEFRA has recorded a population of 755 horses in the ST5 postcode area (2021). The contribution per horse to the economy, according to BETA (2023), is £6,887, therefore in this case a contribution of £5,199,685 per annum. Equestrian activities in semi-rural areas (bring your horse on holiday, pleasure rides, competitions) are increasingly popular in addition to established activities such as schooling and hacking. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liveries, etc). Promoting, nurturing and enabling equestrian access would support the equestrian industry.</p> <p>IN1 and IN2 Infrastructure and Transport</p> <p>Where there are opportunities identified to make existing footpaths useable for cyclists or new paths connecting the network, these should be multi-user routes for all vulnerable road users, including equestrians. Crossings/bridges/underpasses should be designed to include equestrians (eg 'pegasus crossings'). Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already shared by cyclists and other user groups. For maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new cycle paths should be shared with other user groups. The provisions will futureproof the routes and engage a wider range of users in active travel and leisure which in turn will impact positively on health and wellbeing and road safety statistics.</p>
<b>Comment ID</b>	NULLP267
<b>Order</b>	92
<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	The British Horse Society
<b>Consultee Family Name</b>	Bannerman
<b>Consultee Given Name</b>	Wendy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN4
<b>Q6 Details</b>	<p>Dear Local Plan Team</p> <p>Reg 19 Local Plan Newcastle-under-Lyme</p> <p>The response below is from the British Horse Society however our volunteers in the county may also respond at a local level.</p> <p>Overall</p> <p>The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – only 16.4% in Staffordshire - and are increasingly forced to use busy roads to access them.</p> <p>Between 01.01.2023 – 31.12.2023 nationally:</p> <ul style="list-style-type: none"> <li>• 3,345 road incidents involving horses have been reported to The British Horse Society</li> <li>• Of these, 50 horses have died and 77 have been injured</li> <li>• 3 people have died, and 94 people have been injured because of road incidents</li> <li>• 23% of riders were victims to road rage or abuse</li> <li>• 82% of incidents occurred because a vehicle passed by too closely to the horse</li> <li>• 79% of incidents occurred because a vehicle passed by too quickly</li> </ul> <p>'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s104).</p> <p>DEFRA has recorded a population of 755 horses in the ST5 postcode area (2021). The contribution per horse to the economy, according to BETA (2023), is £6,887, therefore in this case a contribution of £5,199,685 per annum. Equestrian activities in semi-rural areas (bring your horse on holiday, pleasure rides, competitions) are increasingly popular in addition to established activities such as schooling and hacking. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liveries, etc). Promoting, nurturing and enabling equestrian access would support the equestrian industry.</p> <p>Policy IN4 Cycleways, Bridleways and Public Rights of Way</p> <p>It is encouraging to see the proposed principles. Please add 'horse' to the phrase 'walking, cycling and riding' in point 1 to be clear. Carriage drivers are also vulnerable road users so where public rights of way are restricted byways or BOATs, carriage drivers must also be included. Modern carriages tend to</p>

	<p>be lightweight and small, around 1.6m wide. Horse riding and carriage driving can provide access to the outdoors for people with mobility issues who would not walk or cycle any distance.</p> <p>Point 2 - Where a development engulfs a bridleway which does not have a sealed surface then the bridleway should be preserved as an equestrian route. Any plan to increase cycling provision should take place separately or ensure that the bridleway is given sufficient width. Additional width will be needed if it is considered necessary to provide asphalt for cycling as it is very undesirable for horses, and indeed many pedestrians. A separate cycle track ensures that riders are able to continue to use the bridleway in safety without the hazard of a sealed surface and cyclists do not have to slow down and give way to horses, which is the legal requirement on a bridleway.</p> <p>Point 3 – whether a bridleway is enclosed or not, the useable width should be no less than 3m ie a level surface with maintained vegetation.</p>
<b>Comment ID</b>	NULLP271
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	The British Horse Society
<b>Consultee Family Name</b>	Bannerman
<b>Consultee Given Name</b>	Wendy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q6 Details</b>	<p>Dear Local Plan Team</p> <p>Reg 19 Local Plan Newcastle-under-Lyme</p> <p>The response below is from the British Horse Society however our volunteers in the county may also respond at a local level.</p> <p>Overall</p> <p>The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – only 16.4% in Staffordshire - and are increasingly forced to use busy roads to access them.</p> <p>Between 01.01.2023 – 31.12.2023 nationally:</p> <ul style="list-style-type: none"> <li>• 3,345 road incidents involving horses have been reported to The British Horse Society</li> <li>• Of these, 50 horses have died and 77 have been injured</li> <li>• 3 people have died, and 94 people have been injured because of road incidents</li> <li>• 23% of riders were victims to road rage or abuse</li> <li>• 82% of incidents occurred because a vehicle passed by too closely to the horse</li> <li>• 79% of incidents occurred because a vehicle passed by too quickly</li> </ul> <p>'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users' (NPPF, s104).</p> <p>DEFRA has recorded a population of 755 horses in the ST5 postcode area (2021). The contribution per horse to the economy, according to BETA (2023), is £6,887, therefore in this case a contribution of £5,199,685 per annum. Equestrian activities in semi-rural areas (bring your horse on holiday, pleasure rides, competitions) are increasingly popular in addition to established activities such as schooling and hacking. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liveries, etc). Promoting, nurturing and enabling equestrian access would support the equestrian industry.</p> <p>PSD6 Health and Wellbeing</p> <p>5.43 Modes of travel, which are not only for utility and in reality mostly for leisure, should not be limited to walking, cycling and wheeling. Plans should include equestrians to make these multi-user routes; otherwise the scenario is horses become sandwiched between MPV traffic on one side and cyclists on the other. Active travel does include equestrians. Jesse Norman in House of Commons debate on Road Safety, 5 November 2018: "We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders".</p> <p>In terms of health and wellbeing, according to BETA (2023) 58% of equestrians are women and Church et al (2010) found 37% of women who are horse riders are over 45 years of age and over a third would pursue no other physical activity. 22% of equestrians are under 16 years old and 15% are over 45 – it is an activity that can span lifetimes. Only 15% of BHS members identify as 'competition riders' with the vast majority enjoying their equines for recreational enjoyment, hacking off-road and on roads. Information is available from <a href="https://www.bhs.org.uk/go-riding/leaflets-and-downloads/">https://www.bhs.org.uk/go-riding/leaflets-and-downloads/</a></p>
<b>Comment ID</b>	NULLP268
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Company / Organisation</b>	The British Horse Society
<b>Consultee Family Name</b>	Bannerman
<b>Consultee Given Name</b>	Wendy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6

<p><b>Q6 Details</b></p>	<p>Dear Local Plan Team  Reg 19 Local Plan Newcastle-under-Lyme  The response below is from the British Horse Society however our volunteers in the county may also respond at a local level.  Overall  The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders. Nationally equestrians have just 22% of the rights of way network – only 16.4% in Staffordshire - and are increasingly forced to use busy roads to access them.  Between 01.01.2023 – 31.12.2023 nationally:  <ul style="list-style-type: none"> <li>• 3,345 road incidents involving horses have been reported to The British Horse Society</li> <li>• Of these, 50 horses have died and 77 have been injured</li> <li>• 3 people have died, and 94 people have been injured because of road incidents</li> <li>• 23% of riders were victims to road rage or abuse</li> <li>• 82% of incidents occurred because a vehicle passed by too closely to the horse</li> <li>• 79% of incidents occurred because a vehicle passed by too quickly</li> </ul> ‘Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users’ (NPPF, s104).  DEFRA has recorded a population of 755 horses in the ST5 postcode area (2021). The contribution per horse to the economy, according to BETA (2023), is £6,887, therefore in this case a contribution of £5,199,685 per annum. Equestrian activities in semi-rural areas (bring your horse on holiday, pleasure rides, competitions) are increasingly popular in addition to established activities such as schooling and hacking. The equine industry provides diverse employment (vets, farriers, feed outlets, saddlers, instructors, venues, liverys, etc). Promoting, nurturing and enabling equestrian access would support the equestrian industry.  SE6 Open Space and SE14 Green Infrastructure  Open space and green infrastructure may provide essential links to connect equestrians from one bridleway/byway to another. Therefore the inclusion of equestrian access where this would enhance the PRoW network as advised in the NPPF should be acknowledged.</p>
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<b>Comment ID</b>	NULLP6
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Barber
<b>Consultee Given Name</b>	Alan
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	138
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>1. The area concerned has been used as allotment and since the late 19th century and appears on maps as designated land. The site was run by Newcastle Borough Council until 2015 when management was passed to ourselves. As such, my understanding, is that the this land can only be changed from allotment land to other is use is with permission of the Secretary of State for the Environment.</p> <p>2. The plan shows that access to the Traveller/Gypsy site would be via the main access gate off Park Road, which leads onto a Public Footpath (No 22) controlled by Staffordshire County Council.</p> <p>3. When the site was passed to us to "Self Manage" the area of land which the proposal covers was supposed to have been cleared by Newcastle Borough Council, however a large quantity of white asbestos (Chrysotile Asbestos) was buried with the full knowledge of the Council and never removed due to cost. It is common knowledge that when the garage, operating from the adjacent business park, used vehicle oil was illegally disposed in that area. This, with the asbestos, renders the land as contaminated.</p> <p>There are no services to this site other than via Cemetary Road or Park Road, which would again cost an enormous amount of money.</p>
<b>Q7 Modification</b>	<p>1. The site is unsuitable for human habitation due to the land being contaminated, which would cost an enormous amount of money to remove the same.</p> <p>2. The proposed access road from Park Road would require the locked access gate to be left open at all times giving no security to the allotment plot holders. The Borough Council themselves have a sign on the gate threatening anyone leaving the gate unlocked faced eviction from the site. If this gate is left open it would allow anyone access, whether their intentions were good or bad.</p> <p>3. The proposed access road from Park Road then leads onto the Public Footpath, this footpath is far too narrow to allow access to towed caravans and other heavy vehicles, no more so than refuse collection wagons. The only way this could be made is by taking land off some of the plots. It is also a rough unmade road this would require tarmac resurfacing, which would again cost an enormous amount of money.</p> <p>4. To give security to the allotments then fencing would be required around its entirety, again costing an enormous amount of money.</p> <p>5. There are no objections from plot holders per sea to this plan but far better access would be provided by access from Cemetary Road, however, our security arrangements should be provided no matter.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the Secretary of the Allotment Association I feel I would be best placed to give the supporting evidence as to why this proposal should be changed.

<b>Comment ID</b>	NULLP1174
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Barber
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>NOTE: All my responses are in Blue</p> <p>Reg19 and related Evidence Documents are in Black</p> <p><b>Reference to site AB12,AB15 &amp; AB33 and related issues that arise including interface with other development in the Local Plan REG19 and associated Evidence documents have been used for comments below.</b></p> <p>General:</p> <p>Population growth figures (Census 2021 &amp; ONS figures) suggest only a 6.9% increase in population, variable student figures do skew this slightly but this is a mobile population.</p> <p>The area of Audley has a population that is mixed but contains quite a few older residents and a younger people who wish to stay if affordable housing ( 1-2 Bedrooms) was available</p> <p>Employment is high although a need for better education and up skilling the workforce is required.</p> <p>Some small growth is required for these populations. However building on green belt land would open the floodgates for excessive development, Especially if AB2 was to go ahead. The risk of over development to chase possible jobs would happen. The risk of over development with surrounding conurbations is high. Note the (NPPF) the borough has already exceeded its recent housing targets. Where is the evidence we need so many more?</p> <p>The projected models would result in many high cost homes with few if any affordable housing for locals. Also these housing numbers do not really match the requirements and exceed them by quite a margin. Are we creating a need for AB2 that does not warrant it based upon inflated employment figures for the economic zones such as AB2/AB2a</p> <p>The vast majority of AB2 site employees would come from the surrounding districts by car, (with generally only outside high income earners in the affordable properties in jobs not related to the economic Zones AB2).</p> <p>Most of these new homes could easily be incorporated in areas of brown field sites (opposite TK30 etc and along the A500 corridor.</p> <p>Regarding building sites it is noted that the employment sites AB2/Ab/2a is on Green Belt flat open easy build terrain( accepted) and TK30 is on Green Belt hilly, mine, and scrap yard site ( rejected).</p> <p>Bus services are dismal for they area and providing a reasonable service appears unviable to most bus operators. New employment sites AB2 would only provide services from Newcastle or Stoke. The report also stresses the difficulties of funding and operators clearly.</p> <p>Traffic from the M/J16 &amp; A500 would cause great congestion if a problem occurred on the Highway system as it does now with traffic taking short cut from Crewe and traffic for school runs etc. The traffic survey does not really address this and any mitigation would be years away.</p> <p>How much funding would S106 and other measures contribute towards infrastructure (eg a £100000 s106 would not pay for a school ( around 15000000 to £200000) let alone the cost of water, and services for a community on top of that. Can the borough afford such investment??</p> <p>Loss of Greenbelt is a serious issue as any mitigation is a poor replacement for nature and habitat and really needs to be a last resort based on sound evidence not economic requirements. It is also grade 1-2-3 Agricultural land.</p> <p><b>AB12</b></p> <p>Location: Green Belt would break and allow further unchecked expansion at a later date. Some livestock use the land regularly</p> <p>Drainage : site has areas of poor drainage or flooding potential that will cause problems for new and existing structures</p> <p>Access: Very poor access given the planned amount of dwelling on this site and the need to reduce traffic on Diglake street which is very narrow. The overflow of parking would be felt right across the area.</p> <p>Traffic: Traffic flow increase would also cause problems through the village</p> <p>Number of dwellings: very large number on site with currently no idea of type or number of each type ( 3 story town house, 5 bedrooms or 1-2 bedroom small house).</p> <p><b>AB15</b></p> <p>Location: Green Belt would break and allow further unchecked expansion at a later date</p> <p>Drainage : site has areas potential poor drainage or flooding potential that could cause problems for new and existing structures</p> <p>Poor access: potential access, but would cause parking problems</p>

	<p>Traffic: high volume of traffic in very narrow streets</p> <p>Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house). AB15 may allow for the required readjusted small amount of housing required for Audley if it is affordable for young people and older residents (being near the centre)</p> <p>AB33</p> <p>Location: Green Belt would break and allow further unchecked expansion at a later date. It also has working agricultural activity and is on good soil. Livestock use the surrounding land also Therefore its loss would not easily be replaced and harm the environment.</p> <p>Drainage : site has areas poor drainage and flooding potential that could cause problems for new and existing structures . New building would cause extra problems too.</p> <p>Poor access: small country lane with associated width of road and junction problems with volumes of traffic.</p> <p>Traffic: as above</p> <p>Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house).</p> <p><i>Reading through all the documents including supporting evidence documents has taken a great deal of time by any individual. Few people including councillors would have a full understanding of all the points contained let alone a non- expert. I believe these documents became available for the full council on July 16th 2024, ready to be passed for scrutiny on the 24th July 2024.</i></p> <p><i>Having some experience of technical documents in industry the following is of concern.</i></p> <ol style="list-style-type: none"> <li><i>a) The time scale given between release and scrutiny as many people involved would not have been aware of all the details from all parts of the final document/s even those who would have been involved in aspects of it. The time scale to fully check (1000,s of pages across numerous documents) given that councillors have other tasks and duties in my view is insufficient to arrive at a full rounded decision based on evidence.</i></li> <li><i>b) Many of the supporting evidence documents are produced by consultants. What assurance do we have to confirm they are fully independent from development involvement bias?</i></li> <li><i>c) The public consultations I have attended have only provided very vague answers. To find more out you have to dig much deeper, hence above notes). Within the consultation timescale many members of the public wish to respond but find the task very confusing, intimidating and with day to day lives hard to complete or do simple not have the skills or equipment to respond. Reg. 18 for me was extremely difficult to complete online despite phone calls, but I did manage it (I think!).</i></li> </ol> <p><i>From above on AB12,AB15 &amp; AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections</i></p>
<b>Q7 Modification</b>	<p><i>To hold review of the facts surround AB12,AB15, AB33 the local plan Reg19. This review that would need to look at the real number of dwellings, linked to a more reasonable review of employment and sites required ( see above section on AB2/AB2a, TK30 ,KL15)</i></p> <p><i>It may on the surface appear expensive and unnecessary as appears to have been sorted out and decided However a pause and a review would be much cheaper in the long run and potentially save millions not to mention good green belt. To provide affordable homes to a local population rather than large homes for outside investment would be a better policy as a small number of dwells are required in the right place would allow a slower development pace and time to reflect and react on trends in a more accurate manner.</i></p> <p><i>From above on AB12,AB15 &amp; AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections</i></p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To gain an understanding of the processes involve in coming to a final decision based upon the technical evidence.
<b>Comment ID</b>	NULLP1168
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Barber
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>NOTE: All my responses are in Blue</p> <p>Reg19 and related Evidence Documents are in Black</p> <p><b>Reference to site AB12,AB15 &amp; AB33 and related issues that arise including interface with other development in the Local Plan REG19 and associated Evidence documents have been used for comments below.</b></p>



#### General:

Population growth figures (Census 2021 & ONS figures) suggest only a 6.9% increase in population, variable student figures do skew this slightly but this is a mobile population.

The area of Audley has a population that is mixed but contains quite a few older residents and a younger people who wish to stay if affordable housing ( 1-2 Bedrooms) was available

Employment is high although a need for better education and up skilling the workforce is required.

Some small growth is required for these populations. However building on green belt land would open the floodgates for excessive development, Especially if AB2 was to go ahead. The risk of over development to chase possible jobs would happen. The risk of over development with surrounding conurbations is high. Note the (NPPF) the borough has already exceeded its recent housing targets. Where is the evidence we need so many more?

The projected models would result in many high cost homes with few if any affordable housing for locals. Also these housing numbers do not really match the requirements and exceed them by quite a margin. Are we creating a need for AB2 that does not warrant it based upon inflated employment figures for the economic zones such as AB2/AB2a

The vast majority of AB2 site employees would come from the surrounding districts by car, (with generally only outside high income earners in the affordable properties in jobs not related to the economic Zones AB2).

Most of these new homes could easily be incorporated in areas of brown field sites (opposite TK30 etc and along the A500 corridor.

Regarding building sites it is noted that the employment sites AB2/Ab/2a is on Green Belt flat open easy build terrain( accepted) and TK30 is on Green Belt hilly, mine, and scrap yard site ( rejected).

Bus services are dismal for they area and providing a reasonable service appears unviable to most bus operators. New employment sites AB2 would only provide services from Newcastle or Stoke. The report also stresses the difficulties of funding and operators clearly.

Traffic from the M<sup>4</sup>/J16 & A500 would cause great congestion if a problem occurred on the Highway system as it does now with traffic taking short cut from Crewe and traffic for school runs etc. The traffic survey does not really address this and any mitigation would be years away.

How much funding would S106 and other measures contribute towards infrastructure (eg a £100000 s106 would not pay for a school ( around 15000000 to £200000) let alone the cost of water, and services for a community on top of that. Can the borough afford such investment??

Loss of Greenbelt is a serious issue as any mitigation is a poor replacement for nature and habitat and really needs to be a last resort based on sound evidence not economic requirements. It is also grade 1-2-3 Agricultural land.

#### AB12

Location: Green Belt would break and allow further unchecked expansion at a later date. Some livestock use the land regularly

Drainage : site has areas of poor drainage or flooding potential that will cause problems for new and existing structures

Access: Very poor access given the planned amount of dwelling on this site and the need to reduce traffic on Diglake street which is very narrow. The overflow of parking would be felt right across the area.

Traffic: Traffic flow increase would also cause problems through the village

Number of dwellings: very large number on site with currently no idea of type or number of each type ( 3 story town house, 5 bedrooms or 1-2 bedroom small house).

#### AB15

Location: Green Belt would break and allow further unchecked expansion at a later date

Drainage : site has areas potential poor drainage or flooding potential that could cause problems for new and existing structures

Poor access: potential access, but would cause parking problems

Traffic: high volume of traffic in very narrow streets

Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house). AB15 may allow for the required readjusted small amount of housing required for Audley if it is affordable for young people and older residents ( being near the centre)

#### AB33

Location: Green Belt would break and allow further unchecked expansion at a later date. It also has working agricultural activity and is on good soil. Livestock use the surrounding land also Therefore its loss would not easily be replaced and harm the environment.

Drainage : site has areas poor drainage and flooding potential that could cause problems for new and existing structures . New building would cause extra problems too.

Poor access: small country lane with associated width of road and junction problems with volumes of traffic.

Traffic: as above

Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house).

*Reading through all the documents including supporting evidence documents has taken a great deal of time by any individual. Few people including councillors would have a full understanding of all the points*

	<p>contained let alone a non- expert. I believe these documents became available for the full council on July 16th 2024, ready to be passed for scrutiny on the 24th July 2024.</p> <p>Having some experience of technical documents in industry the following is of concern.</p> <ol style="list-style-type: none"> <li>1 a) The time scale given between release and scrutiny as many people involve would not have been aware of all the details from all parts of the final document/s even those who would have been involved in aspects of it. The time scale to fully check (1000,s of pages across numerous documents) given that councillors have other tasks and duties in my view is insufficient to arrive at a full rounded decision based on evidence.</li> <li>2 b) Many of the supporting evidence documents are produced by consultants. What assurance do we have to confirm they are fully independent from development involvement bias?</li> <li>3 c) The public consultations I have attended have only provided very vague answers. To find more out you have to dig much deeper, hence above notes). Within the consultation timescale many members of the public wish to respond but find the task very confusing, intimidating and with day to day lives hard to complete or do simple not have the skills or equipment to respond. Reg. 18 for me was extremely difficult to complete online despite phone calls, but I did manage it (I think!).</li> </ol> <p>From above on AB12,AB15 &amp; AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections</p>
<b>Q7 Modification</b>	<p>To hold review of the facts surround AB12,AB15, AB33 the local plan Reg19. This review that would need to look at the real number of dwellings, linked to a more reasonable review of employment and sites required ( see above section on AB2/AB2a, TK30 ,KL 15)</p> <p>It may on the surface appear expensive and unnecessary as appears to have been sorted out and decided However a pause and a review would be much cheaper in the long run and potentially save millions not to mention good green belt. To provide affordable homes to a local population rather than large homes for outside investment would be a better policy as a small number of dwells are required in the right place would allow a slower development pace and time to reflect and react on trends in a more accurate manner.</p> <p>From above on AB12,AB15 &amp; AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To gain an understanding of the processes involve in coming to a final decision based upon the technical evidence.
<b>Comment ID</b>	NULLP1177
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Barber
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>NOTE: All my responses are in Blue</p> <p>Reg19 and related Evidence Documents are in Black</p> <p><b>Reference to site AB12,AB15 &amp; AB33 and related issues that arise including interface with other development in the Local Plan REG19 and associated Evidence documents have been used for comments below.</b></p> <p>General:</p> <p>Population growth figures (Census 2021 &amp; ONS figures) suggest only a 6.9% increase in population, variable student figures do skew this slightly but this is a mobile population.</p> <p>The area of Audley has a population that is mixed but contains quite a few older residents and a younger people who wish to stay if affordable housing ( 1-2 Bedrooms) was available</p> <p>Employment is high although a need for better education and up skilling the workforce is required.</p> <p>Some small growth is required for these populations. However building on green belt land would open the floodgates for excessive development, Especially if AB2 was to go ahead. The risk of over development to chase possible jobs would happen. The risk of over development with surrounding conurbations is high. Note the (NPPF) the borough has already exceeded its recent housing targets. Where is the evidence we need so many more?</p> <p>The projected models would result in many high cost homes with few if any affordable housing for locals. Also these housing numbers do not really match the requirements and exceed them by quite a margin. Are we creating a need for AB2 that does not warrant it based upon inflated employment figures for the economic zones such as AB2/AB2a</p> <p>The vast majority of AB2 site employees would come from the surrounding districts by car, (with generally only outside high income earners in the affordable properties in jobs not related to the economic Zones AB2).</p>

Most of these new homes could easily be incorporated in areas of brown field sites (opposite TK30 etc and along the A500 corridor.

Regarding building sites it is noted that the employment sites AB2/Ab/2a is on Green Belt flat open easy build terrain( accepted) and TK30 is on Green Belt hilly, mine, and scrap yard site ( rejected).

Bus services are dismal for they area and providing a reasonable service appears unviable to most bus operators. New employment sites AB2 would only provide services from Newcastle or Stoke. The report also stresses the difficulties of funding and operators clearly.

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How much funding would S106 and other measures contribute towards infrastructure (eg a £100000 s106 would not pay for a school ( around 15000000 to £200000) let alone the cost of water, and services for a community on top of that. Can the borough afford such investment??

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#### AB12

Location: Green Belt would break and allow further unchecked expansion at a later date. Some livestock use the land regularly

Drainage : site has areas of poor drainage or flooding potential that will cause problems for new and existing structures

Access: Very poor access given the planned amount of dwelling on this site and the need to reduce traffic on Diglake street which is very narrow. The overflow of parking would be felt right across the area.

Traffic: Traffic flow increase would also cause problems through the village

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#### AB15

Location: Green Belt would break and allow further unchecked expansion at a later date

Drainage : site has areas potential poor drainage or flooding potential that could cause problems for new and existing structures

Poor access: potential access, but would cause parking problems

Traffic: high volume of traffic in very narrow streets

Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house). AB15 may allow for the required readjusted small amount of housing required for Audley if it is affordable for young people and older residents ( being near the centre)

#### AB33

Location: Green Belt would break and allow further unchecked expansion at a later date. It also has working agricultural activity and is on good soil. Livestock use the surrounding land also Therefore its loss would not easily be replaced and harm the environment.

Drainage : site has areas poor drainage and flooding potential that could cause problems for new and existing structures . New building would cause extra problems too.

Poor access: small country lane with associated width of road and junction problems with volumes of traffic.

Traffic: as above

Number of dwellings: very large number on site with currently no idea of type or number of each type (3 story town house, 5 bedrooms or 1-2 bedroom small house).

*Reading through all the documents including supporting evidence documents has taken a great deal of time by any individual. Few people including councillors would have a full understanding of all the points contained let alone a non- expert. I believe these documents became available for the full council on July16th 2024, ready to be passed for scrutiny on the 24th July 2024.*

*Having some experience of technical documents in industry the following is of concern.*

- 1 a) *The time scale given between release and scrutiny as many people involve would not have been aware of all the details from all parts of the final document/s even those who would have been involved in aspects of it. The time scale to fully check (1000,s of pages across numerous documents) given that councillors have other tasks and duties in my view is insufficient to arrive at a full rounded decision based on evidence.*
- 2 b) *Many of the supporting evidence documents are produced by consultants. What assurance do we have to confirm they are fully independent from development involvement bias?*
- 3 c) *The public consultations I have attended have only provided very vague answers. To find more out you have to dig much deeper, hence above notes). Within the consultation timescale many members of the public wish to respond but find the task very confusing, intimidating and with day to day lives hard to complete or do simple not have the skills or equipment to respond. Reg. 18 for me was extremely difficult to complete online despite phone calls, but I did manage it (Ithink!).*

*From above on AB12,AB15 & AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections*

<b>Q7 Modification</b>	<p>To hold review of the facts surround AB12,AB15, AB33 the local plan Reg19. This review that would need to look at the real number of dwellings, linked to a more reasonable review of employment and sites required ( see above section on AB2/AB2a, TK30 ,KL 15)</p> <p>It may on the surface appear expensive and unnecessary as appears to have been sorted out and decided However a pause and a review would be much cheaper in the long run and potentially save millions not to mention good green belt. To provide affordable homes to a local population rather than large homes for outside investment would be a better policy as a small number of dwells are required in the right place would allow a slower development pace and time to reflect and react on trends in a more accurate manner.</p> <p>From above on AB12,AB15 &amp; AB33 I am not sure currently given the information seen that the selection of these site and the Local Plan (reg19) clearly demonstrates soundness in this regard due to the issues noted in all above sections</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To gain an understanding of the processes involve in coming to a final decision based upon the technical evidence.
<b>Comment ID</b>	NULLP1165
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barber
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2/Ab2a Local Plan Reg19 and related documents
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>NOTE: All my responses are in Blue</p> <p>Reg19 and related Evidence Documents are in Black</p> <p>( all reference in this section are for AB2/AB2)</p> <p><b>Reference to site AB 2 and related issues that arise including interface with other development in the Local Plan REG19 and associated Evidence documents</b></p> <p>5 Planning for Sustainable Development</p> <p>Policy PSD1: Overall Development Strategy 1.</p> <p>1 The Council will .....</p> <p>5 Planning for Sustainable Development</p> <p>Policy PSD1: Overall Development Strategy</p> <p>5.3 The economic growth scenario applied in the Local Plan is informed by the latest Cambridge Econometrics (March 2023) and Experian (December 2023) economic forecasts for Newcastle-under-Lyme for the period 2023-2040.The economic forecast identifies jobs growth of approximately 237 per annum over the plan period. To meet projected growth in the Borough there is a need to provide for a minimum of 63 hectares of employment land. The Local Plan allocates strategic sites AB2 (Land at Junction 16) and KL15 (Land at Barkers Wood, Keele) to provide Etc .</p> <p><i>The area required for AB2/AB2A is therefore over and above what is required for the area by a significant amount and is therefore not required (see other notes on sites and employment/ transport in more detail below below.)</i></p> <p>Related Documents Sustainability Appraisal (Lepus Consulting, 2024) Habitats Regulations Assessment (Lepus Consulting, 2024) ED001 Housing and Economic Needs Assessment (Turleys, 2024) ED001 a &amp; b Housing and Economic Needs Assessment (Turleys, 2020 &amp; 2023 respectively) ED002 Strategic Employment Site Assessment Report (Aspinall Verdi, 2024) ED002a Strategic Employment Site Assessment Report (Aspinall Verdi, 2023) ED031 &amp; ED032 Plan Strategy Topic Papers (NUL, 2024) ED033 Housing Supply and Delivery Position Statement (NUL, 2024)</p> <p><i>As Above note</i></p> <p>5.20 The Rural Service Centres in the Borough provide a range of essential services and facilities .....</p> <p><b>Ref AB2/AB2A &amp; Land at J16 inc ref to other sites selections.</b> <i>The above statement justification has not been met. As the village of Audley and surrounding area is not commensurate with their role as a rural setting. See below other supporting documents comments as it is all green belt land.</i></p> <p>5.29 The Local Plan allocates strategic employment sites AB2 'Land adjoining corner of A500 and M6 Southbound'andKL15'Land South of A525 between Keele University and Newcastle'. Development will come forward .....</p> <p><i>Note as below</i></p> <p>5.30 Development proposals should also seek to limit the loss of best and most versatile agricultural land in line with the policy approach set out in SE13 'Soil and Agricultural Land'</p>

**Ref AB2/AB2A & Land at J16 including ref to other sites selections.** The above statement does not really tally with SE13 and other supporting documents as it is all green belt land selected. The only difference between sites is location and geography/topography for development see other more detailed sections below to support this view

Policy PSD5: Green B & Related Documents ED008 Green Belt Study (Ove Arup, 2019, 2017, 2020, 2023, 2024) ED009 Green Belt Village Study (Ove Arup, 2024)

**Ref AB2/AB2A & Land at J16 inc. ref to other sites selections** The above statement does not really tally with PDS5/SE13 and related documents above and other supporting documents as it is all green belt land selected. The only difference between sites is location and geography/topography for development. Therefore unjustified. See other more detailed sections below to support this view

#### 8 Employment

Policy 3. High quality sustainable .....transport connections should be provided as part of employment proposals.

- 1 Development should address .....

EMP1: Employment.....

- 1 Proposals that support home working .....

Supporting Information 8.1 ..... & 8.2

8.2 PDS1 choice of sites appear to just favour AB2/AB2 and dismiss details for other sites such as TK30 that could make it an attractive option long term with a bit of forward investment as this is unlikely to produce a good business base short term.

8.3 The plan recognises the importance of .....

8.3 Adequate lorry parking space could easily be provided with a bit of imaginative though at the other locations, through careful design

Supporting Information 8.8 Employment areas play an important role in ensuring that there is a range of employment land.....

**Ref AB2/AB2A & Land at J16 inc. ref to other sites selections In relation to above sections in 8 Employment, points 4,6, Supporting Information 8.1-3 ,8.8.** The employment sites and the amount of future housing are tied together. NUL has a small population growth, good employment levels, requires upskilling work force. Development sites need high quality well paid jobs, large warehousing does not provide this. If built then most workers will come by car from other areas. Housing will increase and most likely not be at the right affordability level for most workers to live locally. Most, projections are assumptions for growth and economic conditions have changed. Please see supporting information above in Employment and Transport below and also evidence documents responses. Selection not justified. Sites on Green belt such as TK30 are in an area already close by other industrial developments and indeed have in some cases been used for such Eg. mining, therefore providing a good reason for use as the land is already Greenbelt, Also such sites are much nearer existing conurbations for housing and employment, workforce. The only issue is it would take 3 minutes extra to get to J16 and the M6

8.2 PDS1 choice of sites appear to just favour AB2/AB2 and dismiss details for other sites such as TK30 that could make it an attractive option long term with a bit of forward investment as this is unlikely to produce a good business base short term.

8.3 Adequate lorry parking space could easily be provided with a bit of imaginative though at the other locations, through careful design

#### 10 Infrastructure and Transport

Policy IN1: Infrastructure

- 1 The Council will support water and wastewater infrastructure investment.....

10.2 Funding for infrastructure will usually need to be secured from a range of sources, but developers will be expected to contribute.....

10.5 Policy IN1 establishes a framework.....

**Ref AB2/AB2A & Land at J16 inc ref to other sites selections In relation to above sections in 10 Infrastructure and transport points 4. & 10.1, 10.2 & 10.5 .** The employment sites and the amount of future housing are tied together. The proposed ideas on funding existing and new infrastructure are quite vague with regard to funding arrangements and S106 guarantees. They do not deliver certainty about infrastructure being built or even provided by who, when? Therefore possible great cost to taxpayer if the money is not sourced from the developer leading to a financial burden on the area at no cost to other parties. Also if these phased developments happen what hard guarantee is provided that services will match the required development in time?? In Evidence documents supporting Local plan Reg19 and supporting relevant evidence documents see comments here and below. Therefore AB2/AB2a cannot be justified on evidence currently supplied.

Policy IN2: Transport and Accessibility

- 1 New development should make appropriate provision for access ..... a. Be located where travel can be minimised and are not car dependent, and the use of sustainable transport and active travel modes maximised.
- 2 Minimise .....
- 3 Provide the necessary infrastructure to support.....
- 4 Protect and, where possible,.....
- 5 Not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking and servicing arrangements.
- 6 Not cause severe residual impacts on the road network.....
- 7 Not cause an unacceptable impact of development.....



- 8 All applications likely to generate significant travel movements should.....
- 9 Show how the proposed development.....
- 0 Encourage and enable sustainable and active travel alternatives .....
- 1 Travel Plans prepared for major developments will be required to monitor the effectiveness of the mitigation measures being delivered. ....

#### Supporting Information

10.8 IN2prioritises the need for sustainable transport infrastructure.....

10.9 Reducing the reliance on the private car .....

10.10. New developments that are predicted to have an adverse impact on the transport network will be expected to contribute towards capacity and mitigation measures. Proposals that require new projects will be required to make a proportionate financial contribution.

*Policy IN2: a, b, c, d, e, f, g & 2 b, c, d + supporting information 10.8 & 10.9, 10, 10 AB2/AB2a will increase traffic, as do all options. The mitigation to reduce traffic (cars) would be to build them nearer the centres of population and provide cycle and bus routes. This would also help to reduce the carbon foot print. Traffic flow through the A500/M6 corridor can be controlled/reduced through exit junctions at Chatterley and TK30.*

*Traffic through the villages with AB2 would also massively contribute to traffic flow that already happens in local villages when vehicles take shortcut through them due to traffic problems. Also future development of housing to support AB2 would increase traffic flow too as would outside employment at AB2. Public transport is a problem (see below comments in evidence responses also, relating to viability and funding of transport services)*

Policy AB2 'Land at Junction 16 of the M6'

Land atJunction16 of the M6 is allocated as a high-quality strategic employment site.

Policy AB2 Land at J16 of M6 1. To 15

*We cannot be sure of the types of development but looking at other Motorway Junction sites they appear to be generally warehousing and not high tech sites (impact on types and value of jobs). Can a more up to date and detail estimate be given on proportion of industry to site?*

*J16 The new junction appears to be either a slip road or a simple traffic light (3 way). There is already congestion and the Highways no money. So there is a high likely hood of a temporary measure ( traffic lights ) and then many years later a multi- million pound scheme to address it at great cost to the tax payer ( eg Talke to Eturia road widening and bridge scheme A500)*

3 on open Greenbelt ??????

- 1 *Employment units to achieve at least BREEAM excellent standard. This is expected on any modern site*
- 2 *Contributions towards or direct provision of suitable on and off-site mitigation measures for any adverse impacts on theM6 (Junction16) or other parts of the highway network. These are not clearly defined as to the exact level of commitment to contribute guaranteed. Therefore a risk to long term viability of funding costs.*
- 3 *13 & 109Site Allocations, 13.14,13.15 :See comments in evidence sections for transport below also.*
- 4 *The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement, The development plan seems to favour only AB2/AB2A employment numbers model. That may not be achieved. How much of S106 money will be provided and through what plans?*
- 5 *Could not find these plans???*
- 6 *Does this mean we have an idea for a AB2 of a site layout and therefore idea of types of buildings and employment for public and independent inspection.*

20 AB2 will require significant water and gas services. It is not clear what damage this will do?

13.22 *Currently when reading have found little evidence of employment and skills plan that reflects the combined effects of AB2 and all other sites in Staffordshire on the employment number and any regular monitoring triggers*

- 1 Satisfactorily addressing the site allocation requirements set out in Policy SA1 (General Requirements),
- 2 Safe and convenient access .....,
- 3 Provision for secure, high quality Heavy Goods Vehicle.....
- 4 Provision .....
- 5 Employment units to achieve at least BREEAM excellent standard .....
- 6 Contributions towards or direct provision of suitable on and off-site mitigation measures for.....,
- 7 Appropriate measures to control impact of increased traffic ..... and mitigation strategy, ...
- 8 The layout and development of the site will be landscape led, with roads, buildings or structures.....
- 9 Implementation of an agreed comprehensive travel plain .....

109Site Allocations.....

- 1 Provision of strategic.....
- 2 Provide for an integrated surface water drainage.....,
- 3 The development being subject to an agreed Employment and Skills Plan secured through a S.106 agreement,
- 4 The development including clear maintenance and management proposals to ensure the ongoing maintenance of the public realm and the environment of the site,
- 5 A utilities masterplan being prepared for the site .....
- 6 Development being located an appropriate distance.....



Supporting Information 13.13 The allocation of the site would result in a loss of a layby.....

13.14 A comprehensive travel plan.....

13.15 The travel plan should support sustainable travel.....

13.16 Development proposals for the site should enhance ...

13.17 A full .....

13.18 The height, scale and form of development .....

13.19 A high-quality landscape will provide .....

110Site Allocations.....

13.21 In line with policy CRE 1 (Climate Change).....

13.22 An employment and skills plan should be prepared.....

13.23 Allocation of a site establishes .....

*Policy IN2: Transport and Accessibility*

**Ref AB2/AB2A & Land at J16 inc ref to other sites selections in relation to above sections in 10 Infrastructure and transport points 4. & 10.1, 10.2 & 10.5 . + above section 1 to 13.1 to 13.23 The employment sites and the amount of future housing are tied together. The proposed ideas on funding existing and new infrastructure are quite vague with regard to funding arrangements and S106 guarantees. They do not deliver certainty about infrastructure being built or even provided by who, when? Therefore possible great cost to taxpayer if the money is not sourced from the developer leading to a financial burden on the area at no cost to other parties. Also if these phased developments happen what hard guarantee is provided that services will match the required development in time?? In Evidence documents supporting Local plan Reg19 and supporting relevant evidence documents see comments here and below. Therefore AB2/AB2a. Cannot be justified on evidence currently supplied.**

NOTES AND COMMENTS FROM SUPPORTING EVIDENCE DOCUMENTS IN REGARD TO AB2/AB2a Below

*ED008 Green Belt Review*

*Green belt assessed list AB 2/2A excluded from list 2020*

*Tables D0 state site AB2 & AB2A does not contribute to Local plan for regeneration and is a strong contributor to the green belt*

*BW1 & 2 ,TK 30 has a stronger case for use?*

Document shows AB2/2A was not considered as a local site a site, but retained as an option although well outside of the local employment area for travel?

Green belt site proforma P F1 to F5

Red site is greenfield

Grade 1,2,&3 agricultural land

Site is completely detached from the existing urban area / inset settlement – the site is approximately 800m away from the nearest inset settlement of Audley.

Access: Site is more than 800m away from a bus stop – 1km to Westfield Avenue bus stop or station

RECOMMENDATION: EXCLUDE SITE FROM PROCESS P F-5

*Clear recommendation of removal of AB2 on this document. No services or local transport means*

BW1 although appears excluded, is suitable according to other data in this table, Pf-30-31

*Reason for rejection could be developer reluctance to prepare land rather than have an easy open green belt site with minimal problems.*

Employment

Green belt assessment States p45 Could neighbouring authorities accommodate some of the identified needs?

*Where is the evidence this has regularly occurred given the proposals for developments at Crewe, Alsager (Radway, Panitoni and other sites nearby). That will impact on the variability of AB2. With regard to the West Midlands Strategic Plan this would also include the impact from / on Stone and Stafford warehouse sites (see my section below, site assessment report section)*

Related Documents: ED001 Housing and Economic Assessment (Turleys, 2024) ED001a Housing and Economic Needs Assessment (Turleys,2024) Employment and Skills Plan Framework (Staffordshire County Council, 2024)

*Documents within the planning Reg19 document and related supporting evidence point out low unemployment, a need for apprentice jobs, but does not discriminate between types eg low end service with poor pay and retention or high value tech/ engineering jobs and good retention. This means we do not know what potential proportion of types we will have trained. AB2 has a high chance of providing only a few high value posts and many low value which may be a drain on services such as welfare due to low pay or high turnover of jobs due to poor job security. Also the plan does not appear mitigate for other sites and completion from outside sources. It is also highly dependent on mobility of the workforce. It is noted in ED011 Transport the bus and vehicle problems ( see also related comments below). Also doc ED011 appears to show within the maps job figures max and min and table only the maximum number of jobs therefore a possible bias towards AB2 base on this assumption.*

ED029 Site Assessment report

8.15. Alongside the identification of sites for housing, it is also important to consider employment requirements. As outlined earlier in the report, it has been necessary to look at employment sites on an opportunity basis. Alongside the site selection report, consultants Aspinall Verdi have considered the role of strategic employment sites in the borough (sites AB2, KL15 and TK30). Site AB2 has been considered through the site selection report to determine its suitability to help meet the Council's identified employment needs. Table 30 below, sets out the conclusions from the site selection assessment of site AB2:- Mitigation measures reqd P39

Table in Appedix: Planning & Sustainability table for AB2 table extract : The exceptional circumstances required to release this area of land from the Green Belt arise from the exceptional circumstances set out in general terms in the Plan Strategy Paper(s). The strategic employment site at Junction 16 of the M6 (currently Green Belt) provides a sub-regional logistics focused employment park to accommodate employment development to meet a sub-regionally identified logistics need and provide for alternative HGV parking, in line with evidenced requirements demonstrating the need for such provision. There is a strategic need for employment land in this location, close to the M6 and strategic road network, as well as a general lack of other suitable sites to meet the overall scale of new employment land needed in the borough. Therefore, there are site level exceptional circumstances to amend the Green Belt to accommodate this strategic employment site.

*This site was not originally in the employment land requirements and is over and above land required for employment in the area of the local plan, and appears to have been added as an afterthought based on ease of developer/ investor construction and location ( grade 3 agricultural land also flooding is an issue). The sub regional employment argument can be used on any other contender sites to recommend for use. The Plan strategy papers do not state it has to be at that location at all.*

*Extract form table AB2 : allocated site in the Local Plan subject to appropriate policy wording.*

*Nice tidy wording is capable of hiding or re- packaging a message to sell a point that may not give all the details clearly, so why use it? Also was any consideration given to check if all the information given was read and digested and understood by the interested parties is there a record to check?*

Extract form table AB2 : The exceptional circumstances required to release this area of land from the Green Belt arise from the exceptional circumstances set out in general terms in the Plan Strategy Paper(s). The strategic employment site at Junction 16 of the M6 (currently Green Belt) provides a sub-regional logistics focused employment park to accommodate employment development to meet a sub-regionally identified logistics need and provide for alternative HGV parking, in line with evidenced requirements demonstrating the need for such provision. There is a strategic need for employment land in this location, close to the M6 and strategic road network, as well as a general lack of other suitable sites to meet the overall scale of new employment land needed in the borough. Therefore, there are site level exceptional circumstances to amend the *Green Belt to accommodate this strategic employment site.*

*Right along the M6 corridor this argument could be used. Indeed has any thought been given to over exposure of similar developments along the M6. Crewe, & Alsager already have plans to develop warehouses within 1 to 10 miles of this area, and also the current warehouse/industrial developments along the A500 corridor (Chatterly Valley). This will create over capacity within the area for similar structures rendering the sites as unviable. Not to mention Stone and Stafford (part of the Plan for the West Midlands too).*

10 infrastructure Transport P64 On .....

10.2 Funding for infrastructure will usually need to be secured from a range of sources, but developers will be expected to contribute towards all or part of the cost of providing relevant infrastructure that is directly related to the development or adds to the cumulative impact on strategic infrastructure. Pressure on infrastructure caused by new developments should therefore be offset by infrastructure investment funded by that development. Additional and improved infrastructure may also be provided on site by the developer. It is often the case, however, that for development to integrate into existing patterns of infrastructure, a developer will make a financial contribution towards the upgrade of existing infrastructure or provision of new infrastructure by the infrastructure provider.

Also

10.5

10.6 The Council will work etc

*Regarding funding provided by a developer (S106). This in many cases is downgraded, reduced, changed or takes years to recover and sometimes only in part. This is a considerable amount of money and I see little evidence in the plan and supporting document to protect the NULBC and residents from a significant financial loss over time. As the rules appear to allow it use to be minimised to suit the developed.*

Policy IN2: Transport and Accessibility

10.8 IN2 prioritises the need for sustainable transport infrastructure etc

10.9 Reducing the reliance on the private car

10.10 New developments will need to provide, as appropriate, Transport Statements, Transport Assessments and Travel Plans to ensure the delivery of travel choices and sustainable opportunities for travel in line with the latest government guidance and best practice. New developments that are predicted to have an adverse impact on the transport network will be expected to contribute towards capacity and mitigation measures. Proposals that require new projects will be required to make a proportionate financial contribution.

10.12 Specific thresholds / circumstances that trigger when travel assessments are needed are set by Staffordshire County Council, who as the Local Highway Authority has an obligation to assess the transportation impact of all development proposals in order to make sure that they can be satisfactorily included into the transport network.

10.13 In setting the approach, regard in particular should be had to any relevant aspects of the etc

10.14 On sites proposed for allocation in the Local Plan etc

10.15 Robust datasets which show the effect of including sustainable transport networks and local facilities into new developments should be collated and presented etc.

10.16 The Local Transport Plan, prepared by the County Council provides for an important reference etc

10.25 Proper integration of routes within development sites will provide safe,

ED011 Strategic Transport Assessment

Page29 Site AB2 (M6 Junction 16) has poor accessibility etc

*See above sections as to reasons for not being a justified choice.*

ED011 4.7 Air Quality

*The report on pollution suggest the harm and cost of poor health with relation to traffic. Has a detailed study of options other than AB 2 been fully considered as these may well have less long term impact*

5.4 2023 Model Validation ( Page 40- 0n)

*See below note*

8.1 Scenario Development ( page 47 -on)

*See below note*

8.3 Model Run 2 – Core and AB2

*With regard to all developments the model validations do not to me appear to have taken into account the traffic growth from neighbouring developments along the A500 M6 corridor. Where is the evidence of co-operation between authorities recently to mitigate problems caused by overdevelopment and cancellation of the HS2 northern section? This does have an impact on all the figures.*

TRAFFIC DATA ED011 8.3.1

8.6.3 M6 Junction 16 (AB2) Forecast Turn Flows As was noted in section 5.4, following the reduction in anticipated traffic growth after COVID-19, the NSMM transport model is over-predicting forecast traffic and in addition, the AB2 site lies towards the edge of the NSMM transport model internal area. Therefore, a different approach to presenting traffic growth around M6 Junction 16 will be utilised. 2022/23 post-COVID-19 NSMM transport model validation: • Overall, the model is overestimating flow in the base year compared to the 2023 data. This is more pronounced in the WebTRIS data where traffic flows the model shows an overestimation of around 26-28% • In total terms the model does not validate well against the 2023 WebTRIS data with only around 15-35% of counts passing.

NSMM Model Runs (p76) • Site AB2 showed improvements to junction delays as a result of testing proposed enhanced public transport connectivity.

Site AB2 - Land southeast of Junction 16: ( Page 81)

Issues:

- The workforce is not within immediate proximity, Etc and the site is removed from current public transport routes and local service centres, which could necessitate the creation of Sustainable Travel Plans. Etc .... but this also means that the impact on the transport network needs careful consideration.

For both sites, NULBC intends to consider any impact on the transport network when undertaking the site selection process and to work with neighbouring councils to model the impact of proposed sites on the wider transport network to determine what mitigation may be required. Additionally, there is an intention to investigate the potential for all new developments to contain electric charging points to support new forms of transport such as electric cars.

While both sites have potential for development, there are transport-related issues that would need to be carefully planned for and mitigated to ensure sustainable and efficient access and to minimise negative impacts on the existing transport network and local communities. The STA will provide evidence on the transport-related impact on the network and provide recommendations.

Minutes 18/03/24 2040 Reference Case (Sweco).

o Slight to Serious traffic delays are forecasted on the A500 EB approach to the M6/A500. o

( Page 91 )M6 Jct 16: o The NSMM is adjusted and now modelling additional AB2 traffic flow similar to the approved Jct 16 Visim model. The NSMM is a strategic model and doesn't have the same level of detail as the Jct 16 microscopic Visim model.

( minutes Page 85) From the validation analysis, NSMM over-forecasts in some areas. We can apply an incremental approach for key junctions. For example, we could utilise the Vissim model that exists for M6 J16 to provide more detail. • Sensitivity testing will be undertaken. •

Assessment methodology (including strategy for scoring junction delays): presenting three approached for scoring junction delays. Previously used a RAG rating for SoTCC (20 S

40 secs, 40-60 secs >60 secs). However, another approach has been utilised by SoTCC (12 mins, >2 mins). • Alternative approach: Highway capacity manual - American manual though sometimes used in UK, requires categorisation of signalised/non-signalised junctions.

Minutes of 19/06/2024 (page 91-on)

- M6 Jct 16: o The NSMM is adjusted and now modelling additional AB2 traffic flow similar to the approved Jct 16 Visim model. The NSMM is a strategic model and doesn't have the same level of detail as the Jct 16 microscopic Visim model. The NSMM has some disadvantages with Jct 16 being on the edge of the fully modelled area, indicated by lower-than-expected turn proportions

from M6 NB to A500 WB when compared to available MCC turn data. This movement has a small absolute number of car movements (approx. 50) in the MCC data. This movement is shown to not be impacted by LP trips in the NSMM model. o Our current approach for Jct 16 is to present the change in trips (Final Scenario - RC) on top of observed turn counts factored to future year. o Both Jct 16 Visim and NSMM models give confidence that they show similar flow patterns. o Further testing our final scenario will be testing a combination of core and strategic sites providing confidence against the schemes going forward for the Local Plan. •

( minutes p91) Sweco | Strategic Transport Assessment Newcastle-under-Lyme Borough Council Project Number 65212118 Date 2024-07-18 Ver 3 Document reference NuL LP STA Final Report.docx 92/103

o The NSMM has some disadvantages with Jct 16 being on the edge of the fully modelled area, indicated by lower-than-expected turn proportions from M6 NB to A500 WB when compared to available MCC turn data. This movement has a small absolute number of car movements (approx. 50) in the MCC data. This movement is shown to not be impacted by LP trips in the NSMM model. o Our current approach for Jct 16 is to present the change in trips (Final Scenario - RC) on top of observed turn counts factored to future year. o Both Jct 16 Visim and NSMM models give confidence that they show similar flow patterns. o Further testing our final scenario will be testing a combination of core and strategic sites providing confidence against the schemes going forward for the Local Plan.

*This set comments on above sections for: all above information in Transport ED011 8.3.1 (and relevant sections in Reg. 19 that it supports) & data VISIM & NSMIM are data across two boundaries (Midlands and the Northwest ) and appear to be combined assumptions . Where is an independent validation of these figures as*

- *The do not appear to include or discuss the expanded traffic numbers from other developments in Crewe, Weston, Alsager, Radway, Panatoni , Stoke , A500 Chatterley Valley and this will have a significant impact on the capacity of J16 M6 and the outcome of the local plan impact and viability*
- *Has the impact of potential other sites been discussed and modelled with other neighbouring authorities as no evidence appears in the documents read.*
- *It has been acknowledged that the M6 is a national transport corridor (see page 81). It is not clear how much of the extra flow through of the traffic will affect AB2 and J16 ( see2)*
- *The statements clearly demonstrate disadvantages of the modelling provided for the local plan which present a risk to the whole project as they are assumptions and the impact could easily be far greater potentially than is currently anticipated*
- *It must also be noted that in the event of a closure of one of the main highways (M6/A500) the impact on surrounding roads and communities would be very significant due to people being re-routed. This does not seem to have been taken into account this been taken into account?*
- *Has the recent cancelation of the northern leg of the HS2 line been accounted for and the impact it will have Strategic plans ( Midlands & North west ) on transport figures*

Section4 Page 92-0n

Final Scenario (Sweco) Uncertainty Log for Final Scenario:

o No changes to employment allocation • Strategic Sites – we are going forward with two strategic sites, and we will have a final scenario based on those

- Strategic Sites – we are going forward with two strategic sites, and we will have a final scenario based on those o AB2 o KL15

o AB2

o KL15 • Mitigations

o TBC

o Likely to include Keele

*From this section of the document (minutes ) What are the TBC for AB2? Considering date of mins? Regarding AB2/AB2a*

*Air Quality ED011*

*Local AQ Management: overview of nearby Air Quality Management Areas (AQMA)s of NULBC and SoTCC. Discussion on the North Staffordshire Local Air Quality Plan under ministerial direction. Discussion of the link between poor air quality and respiratory illnesses. Local hospital admissions for respiratory conditions exceeds national average.*

*( minutes Page 84) Overview of AQ Constraints: maps illustrating the 2022 Annual Mean NO2 around the three strategic sites. M6 likely to present main constraint and will be significant source of air pollutant emissions near to each site. Monitoring in proximity to each site suggests existing levels of NO2 are below national standard (40µg/m3). There are some potentially sensitive designated sites nearby that might be sensitive to changes in nitrogen such as Ancient Woodland and SSSIs.*

*The increase of further pollution is confirmed by the rise in future transport growth. No apparent correlation of the increase in pollution if all the ware house/industrial sites from Crewe ,Alsager, Radway Green Stoke A500 corridor + general M6 through Traffic increases happen. Local plan does not appear to have modelled this important point. Only concentrating on AB2?*

TRANSPORT/CAR/BUS ED011

1 Land at J16 of the M6 (ref: AB2): Page 7

o Public Transport: There is a lack of public transport serving the site, which could limit access for employees without private vehicles. Etc.



Site AB2 - Land southeast of Junction 16: (Page 81)

Issues:

- The workforce is not within immediate proximity, and the site is removed from current public transport routes and local service centres, which could necessitate the creation of Sustainable Travel Plans.

(page 86) Minutes 18/03/24 AB2:

- PG: Concerned about baseline public transport access • PT: Agreed. Needs access by sustainable means. • PG: Where developers agree to fund an enhanced bus service, there is a risk of it being discontinued once the funding period concludes leaving a site with no public transport access • JK: Mitigation is needed for J16 sites. We need to understand how the buses will operate outside of working hours. Operators need to be willing to run those and understand what they are going to do with the vehicles for the rest of the day.

8.6.1.1• (page 66)

AB2 o Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this

Comments

*Assumed service only? 10% by bus is a high estimate as it is more likely to be around 3%*

*Other documents clearly state that public transport is not a given and once funding is withdrawn could /will be a draw on public funds to upkeep. Especially as the 10% uptake is a rather high estimate See also 8.6.1.1• (page 66) comments.*

*The potential workforce for AB2 will be mainly by car with all the associated problems with traffic jams and people taking short cuts through the residential areas.*

Viability ED004

Industrial / Warehouse Spaces Market Overview

5.29 Before the global pandemic, most new builds focussed on Etc.

5.30 Owing to the focus of the industrial market on large units Etc

5.31 What is now being experienced is a slight cooling of the strategic warehouse market as online sales are not growing to the same extent

Slide P32 Occupiers now require smaller but higher quality space

Slide P33 In recent years we have seen strong demand for strategic warehousing • Drive by growth in online sales • Requirements from retailers and third party logistics

*Currently there are a great deal of empty warehouses and spare capacity within 10miles of AB2, such as JCB site, also the Chatterly site has experienced financial turbulence and pull out as well as developer problems, the Alsager warehouses (empty for 4yrs) just to mention a few.*

*Slide P32 make the point that we need smaller high quality space, no mention of massive warehouses.*

*Note slide p 33 presented in the Presentation at the end quotes a 'Strong demand' with no points being made of a slowing market which is a risk to Reg19 ( given current world situation too)*

SUSTAINABILITY APPRISAL Vol 1,2,3 of 3 in support of Reg19

5.4.9 (p34) The three reasonable alternative options for the quantum of employment growth identified by NuLBC at this stage of the plan making process, etc + table

*The population growth as suggested in the Census 2021 would not produce the required trained workforce for the area in the Higher Growth section. This means not so much land is required.*

Table 5.11 & 5.12

Option 6a or 6b

*These appears to be a good option that retains potential for sustained economic growth based upon population figures and potential jobs at various level of value. And have occupied buildings*

*5.6.6 Although Option 6c has the potential to deliver the highest quantum of employment floorspace, Options 6b and 6d will support development within the University of Keele Growth Corridor, with associated benefits for employment skills and training opportunities. As such, Options 6b and 6d were identified as the best performing overall.*

*The choice of 6c is hard to justify as due to automation and low skill jobs it would produce the least benefit for the local population. Does the highest quantum of employment floor space mean largest number of low paid employment in a given area? High quality Tech jobs at Keele would deliver a better long term choice and attract high value investment and Tech expertise.*

Employment

13.1.7 According to the HEDNA (2024)127, there is a need of between 43.1ha and 83.0ha of employment land between 2023 and 2040

13.1.8 The objectives include improvements to the education system to increase the skill levels of both children and adults, as well as improved productivity and innovation, particularly with regards to technology.

13.1.9 The percentage of people who are economically active in Newcastle-under-Lyme is higher than average.

	<p><i>Above points of suggest that the population mainly employed and slow growing, needs training to a higher level of aspiration. Which currently suggests the assumption of 83 Ha of employment land is not required, especial as a fair number of higher educated people would move ( if they could not jobs at Keele Tech site KL15). To increase the land required to 80Ha would require a substantial increase in housing and unrequired or sustainable economic development.</i></p> <p>13.1.15 Bus service and section 13.2</p> <p><i>As suggested in the transport document services are dismal and uneconomical for the population and securing funding by any means is limited ( AB2 low paid workers transport?)</i></p> <p>Soil section 14</p> <p>14.1.5</p> <p><i>AB 2 is on prime grade agricultural land and flies in the face of this sections recommendations, other green field sites nearer local conurbations could be used such as TK30 that hat previous mine workings and a scrapyard.</i></p> <p>TK30 ( page121)The site is currently non preferred as it is a greenfield site. It is the Green Belt and makes a moderate contribution to Green Belt purposes. The site is adjacent to Bignall End Coal Yards Local Wildlife Site. The site consists of Grade 3 agricultural land. The site contains areas of potential contamination and mining history that would require mitigation / further assessment. The site is in close proximity to Grade II listed Wedgewood Monument. The site has been assessed through the Strategic Employment Sites Assessment which has indicated that there are potential issues to overcome including highways, historic land contamination / mining activity, ecology, topography, and impacts on the setting of the Wedgewood Monument. The site has poor access to a range of services and facilities.</p> <p>AB2 (page11) The site is a preferred site in the Local Plan. The site is a strategic employment site with locational advantages for logistics use to meet local / regional employment land requirements. The site will also include a lorry park for Heavy Good Vehicles.</p> <p><i>From selected /rejected sites above Tables (559) It appears that land that may have a some issue that needs addressing such as pylons, coalyard, Old mining, hills etc. and is in the green belt , but much closer to housing, transport and services is rejected. But the wide open Greenspaces such as AB2 has been selected this can be construed as selecting the most easy cost effective option for the developers and council There is a risk that Group think may be at work here to obtain the answer required and interpreting the data really needs to be checked again by a third party to confirm findings</i></p> <p><i>Additional notes Regarding AB2/AB2a</i></p> <p><i>Reading through all the documents including supporting evidence documents has taken a great deal of time by any individual. Few people including councillors would have a full understanding of all the points contained let alone a non- expert. I believe these documents became available for the full council on July16th 2024, ready to be passed for scrutiny on the 24th July 2024.</i></p> <p><i>Having some experience of technical documents in industry the following is of concern.</i></p> <ul style="list-style-type: none"> <li><i>• The time scale given between release and scrutiny as many people involve would not have been aware of all the details from all parts of the final document/s even those who would have been involved in aspects of it. The time scale to fully check (1000,s of pages across numerous documents) given that councillors have other tasks and duties in my view is insufficient to arrive at a full rounded decision based on evidence.</i></li> <li><i>• Many of the supporting evidence documents are produced by consultants. What assurance do we have to confirm they are fully independent from development involvement bias?</i></li> <li><i>• Do we have full information in the public domain of consultations with any developers and council? To gain an informed view of the economics (min and max projections) and its effect on the final cost to the tax payer as value for money ( now till 2040)?</i></li> <li><i>• The public consultations I have attended have only provided very vague answers. To find more out you have to dig much deeper, hence above notes). Within the consultation timescale many members of the public wish to respond but find the task very confusing, intimidating and with day to day lives hard to complete or do simple not have the skills or equipment to respond. Reg. 18 for me was extremely difficult to complete online despite phone calls, but I did manage it (Ithink!). So how accurate is the consultation?</i></li> </ul> <p><i>I am not sure currently given the information seen that the selection of AB2/AB2a and the Local Plan (reg19) clearly demonstrates Legal compliance and soundness in this regard due to the issues noted in all above sections (Continue on a separate sheet /expand box if necessary)</i></p>
<b>Q7 Modification</b>	<p><b>Reference to site AB2/2a and related issues that arise including interface with other development in the Local Plan REG19 and associated Evidence documents</b></p> <p><i>In regard to the Local Plan Reg19 ( all of document and supporting evidence) and selection of site AB2/AB2a</i></p> <p><i>To hold review of the facts surround AB2/AB2a and indeed the whole of the local plan Reg19. It may on the surface appear expensive and unnecessary as the outcome has been assessed and reviewed all questions answered. However a pause and independent review would be much cheaper in the long run and potentially save millions not to mention good green belt. This review would also allow other authorities (Cheshire east, Staffordshire, Northwest etc. and relevant strategic plans) to review any overlaps of economic , employment and transport assets rather than all going for a theoretical maximum growth scenario which will not exist.</i></p> <p><i>I am not sure currently given the information seen that the selection of AB2/AB2a and the Local Plan (reg19) clearly demonstrates Legal compliance and soundness in this regard due to the issues noted in all above sections</i></p>



<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To gain an understanding of the processes involve in coming to a final decision based upon the technical evidence.

<b>Comment ID</b>	NULLP114
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I believe the plan is not well prepared. Looking at the figures, it seems that:</p> <p>Land Required:  22 ha needed  61.76 allocated</p> <p>However, the plan indicates that a total 80 ha would be withdrawn from the greenbelt, with 61.76 ha for employment use  It seems that there is an extra 39.76 ha .. why?</p> <p>Assuming this went ahead, there are many issues which come into play, chiefly the likely congestion and associated air pollution. At present, the junction between the A500 and the M6 can become very congested, with slow traffic extending some distance from that junction. It is not clear in the plan how this might be mitigated, if it can be. There does not seem to be a clear access to the A500 from the AB2 site shown on the map.</p> <p>When there are issues occurring on the M6, which happens quite frequently, traffic will often make its way back up the A500 to Audley and then begin to fill up the roads here, again with extra air pollution.</p> <p>I feel that the bigger issue will be caused by workers making their way to the site. The local roads will struggle to accommodate them at certain times and extra lorries would be most unwelcome owing to the noise, damage to the roads and increased air pollution which they invariably cause.</p> <p>Finally, it seems foolish to remove good greenbelt land from our agricultural reservoir at a time when the country is going to need it far more than an "employment" site.</p>
<b>Q7 Modification</b>	AB2 is not inherently a bad idea, however there are other areas which could be used, for example there are empty warehouses near to the Radway Green site in Alsager.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

Comment ID	NULLP1223
Order	199
Title	Policy NC13 Land West of Bullockhouse Road, Harriseahead
Consultee Family Name	Barlow
Consultee Given Name	Derrick
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p>There are a number of reasons as to why this Local Plan is not legally compliant, unsound and fails to comply with the duty to co-operate. I will list these in turn:</p> <p><b>The local plan will not be consistent with the incoming National Planning Policy Framework (NPPF).</b></p> <ol style="list-style-type: none"> <li>1 There is no evidence that the Brownfield sites in the area are being investigated before condemning the greenbelt sites. For e.g. there are dwellings which are unused in the areas which could be repurposed which have not been considered.</li> <li>2 There is no evidence of a traffic survey or any effort to mitigate the concerns raised regarding school traffic or the existing extensive traffic problems already in the area (especially Chapel Lane, which has no footpaths). At the planning meetings, it was inferred that Traffic Modelling had been carried out, but upon looking at the plan it is clear this only covers the M6 and A500 which is nowhere near our location. Parking is already a considerable issue, with cars parked up to and beyond our road (Freedom Drive). There has been no consideration of how the Local Plan will exacerbate these issues even further, causing extensive disruption to residents and the associated road safety concerns.</li> </ol> <p><b>The consultation was poorly managed and communicated.</b></p> <ol style="list-style-type: none"> <li>1 I was not aware of the first consultation and only became aware of the second period when someone photographed and posted on Facebook a paper notice attached to the gate of NC13 before it got wet and blew away less than a week later. The meetings at Kidsgrove Town Hall were also terribly managed. I personally queued up for 20 minutes to speak to a representative of Newcastle Council and when I eventually spoke to him, he did not know where NC13 was. This shows the lack of consideration for residents trying to discuss the consultation.</li> <li>2 After speaking to a number of local residents, it is clear that the consultation process has been completely inaccessible for elderly people in particular. The planning portal was difficult to navigate and make comments and particularly for those who do not have IT skills and knowledge, this is a very exclusionary and intimidating practice.</li> <li>3 In summary, I felt that the whole consultation process was a tick box exercise rather than an opportunity to engage thoroughly with residents about their concerns.</li> </ol> <p><b>The Local Plan has not adequately considered the loss of the local heritage of the area.</b></p> <ol style="list-style-type: none"> <li>1 This particularly relates to the well-known views across NC13, affectionately known locally as 'The Promenade'. You can even see the Welsh Hills on a clear day, which will be lost as a consequence of the Local Plan. When walking from Packmoor to Mow Cop, NC13 is the only proper Greenfield site, highlighting the importance of maintaining this. Despite the plan stating 'buildings are designed to ensure they are not intrusive to the significant views in the surrounding area', this is factually incorrect. Building houses in NC13 will of course be intrusive and to state otherwise is offensive to local people's intelligence.</li> <li>2 As a result of NC13, the area will no longer constitute as semi-rural due to the increase in habitants and loss of Greenfields and will rather be closer to an urban location.</li> <li>3 The Local Plan provides no specific information about how local services, including Thursfield Primary School and doctor's surgeries, will be affected and consequently compensated for the increase in residents as a result of NC13. It merely states 'financial contributions to improvements in the capacity of local schools and health facilities'- it is not clear what this actually means and if this contribution will be sufficient.</li> </ol> <p><b>The Council Planning meetings were unfair and a foregone conclusion before any debates were heard.</b></p> <ol style="list-style-type: none"> <li>1 Labour Councillors during these meetings stated that due to the sheer volume of documents and evidence, there was not ample time to adequately consider the application (they were given just a few days to look at this). Their suggestions to delay the process until everybody had time to review the documents properly were ignored. A vote was taken with 25 Conservative Councillors and 16 Labour Councillors present. The vote was carried out and was voted 25 against the motion and 16 for. Following this, there were debates between all parties and although there were valid points on both sides, the final vote on whether the plan would progress to full planning was 25 to 16 again. This was clearly a politically motivated vote and an example of 'towing the party line' rather than a genuine consideration of the validity of the Local Plan.</li> </ol>
Q8 Hearing attendance	No, I do not wish to participate in hearing session(s)
Comment ID	NULLP1224
Order	6

Number	1
Title	Consultation (not part of the Plan)
Consultee Family Name	Barlow
Consultee Given Name	Derrick
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p>There are a number of reasons as to why this Local Plan is not legally compliant, unsound and fails to comply with the duty to co-operate. I will list these in turn:</p> <p><b>The local plan will not be consistent with the incoming National Planning Policy Framework (NPPF).</b></p> <ol style="list-style-type: none"> <li>1 There is no evidence that the Brownfield sites in the area are being investigated before condemning the greenbelt sites. For e.g. there are dwellings which are unused in the areas which could be repurposed which have not been considered.</li> <li>2 There is no evidence of a traffic survey or any effort to mitigate the concerns raised regarding school traffic or the existing extensive traffic problems already in the area (especially Chapel Lane, which has no footpaths). At the planning meetings, it was inferred that Traffic Modelling had been carried out, but upon looking at the plan it is clear this only covers the M6 and A500 which is nowhere near our location. Parking is already a considerable issue, with cars parked up to and beyond our road (Freedom Drive). There has been no consideration of how the Local Plan will exacerbate these issues even further, causing extensive disruption to residents and the associated road safety concerns.</li> </ol> <p><b>The consultation was poorly managed and communicated.</b></p> <ol style="list-style-type: none"> <li>1 I was not aware of the first consultation and only became aware of the second period when someone photographed and posted on Facebook a paper notice attached to the gate of NC13 before it got wet and blew away less than a week later. The meetings at Kidsgrove Town Hall were also terribly managed. I personally queued up for 20 minutes to speak to a representative of Newcastle Council and when I eventually spoke to him, he did not know where NC13 was. This shows the lack of consideration for residents trying to discuss the consultation.</li> <li>2 After speaking to a number of local residents, it is clear that the consultation process has been completely inaccessible for elderly people in particular. The planning portal was difficult to navigate and make comments and particularly for those who do not have IT skills and knowledge, this is a very exclusionary and intimidating practice.</li> <li>3 In summary, I felt that the whole consultation process was a tick box exercise rather than an opportunity to engage thoroughly with residents about their concerns.</li> </ol> <p><b>The Local Plan has not adequately considered the loss of the local heritage of the area.</b></p> <ol style="list-style-type: none"> <li>1 This particularly relates to the well-known views across NC13, affectionately known locally as 'The Promenade'. You can even see the Welsh Hills on a clear day, which will be lost as a consequence of the Local Plan. When walking from Packmoor to Mow Cop, NC13 is the only proper Greenfield site, highlighting the importance of maintaining this. Despite the plan stating 'buildings are designed to ensure they are not intrusive to the significant views in the surrounding area', this is factually incorrect. Building houses in NC13 will of course be intrusive and to state otherwise is offensive to local people's intelligence.</li> <li>2 As a result of NC13, the area will no longer constitute as semi-rural due to the increase in habitants and loss of Greenfields and will rather be closer to an urban location.</li> <li>3 The Local Plan provides no specific information about how local services, including Thursfield Primary School and doctor's surgeries, will be affected and consequently compensated for the increase in residents as a result of NC13. It merely states 'financial contributions to improvements in the capacity of local schools and health facilities'- it is not clear what this actually means and if this contribution will be sufficient.</li> </ol> <p><b>The Council Planning meetings were unfair and a foregone conclusion before any debates were heard.</b></p> <ol style="list-style-type: none"> <li>1 Labour Councillors during these meetings stated that due to the sheer volume of documents and evidence, there was not ample time to adequately consider the application (they were given just a few days to look at this). Their suggestions to delay the process until everybody had time to review the documents properly were ignored. A vote was taken with 25 Conservative Councillors and 16 Labour Councillors present. The vote was carried out and was voted 25 against the motion and 16 for. Following this, there were debates between all parties and although there were valid points on both sides, the final vote on whether the plan would progress to full planning was 25 to 16 again. This was clearly a politically motivated vote and an example of 'towing the party line' rather than a genuine consideration of the validity of the Local Plan.</li> </ol>
Q8 Hearing attendance	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP192
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

Can't see how Red Street can or could cope with all the extra traffic - then theres the pollution from all traffic its bad enough now when theres a problem with on A34 or 500. Red street is used as a rat run, heavy lorries which makes property's shake, and then theres where all these children are to go to school. Parking at St Chads school is a nightmare now with buses unable to get through. No room at Doctors or Dentists can't get any appointments now, then who in there right mind would say its ok to build houses on ground which has problem with sinkholes could it cause problems with homes already here a lot have had to pinned, we at Red Street have a lot of wildlife which would be lost, can the drains take anymore rain water, A34 sets closed now while we have a field to take most of the rain Im sure theres lots of brown belt or even land which be better used for homes. CT1 shouldnt be allowed.

<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP233
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Diane
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b> <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>



When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP115
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Karen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The withdrawal of 80 HA of Grade 3 Agricultural farmed land in the Local Plan is unjustified, excessive and unsupportable in this area for the 22 HA of employment land the Council states the Borough needs. The plan is not positively prepared and is ineffective as there are alternative sites available and one is standing empty ie; the warehouse site at Radway Green near Alsager. The area does not have sufficient existing infrastructure and in the current and future financial climate is unlikely to (money already spent on HS2, financial climate of Local/Central Government, Ukraine war etc)</p> <p>There are regularly problems on the M6 and A500 which the local authorities, business leaders, employers etc know about, both are heavily congested and the traffic uses this area as a way of bypassing these problems when they occur. I have personal experience of large heavy goods lorries unsuitable for the road network they are using and in some instances ignoring roads signed as unsuitable for the vehicle being driven altogether.</p> <p>There would be an increase in pollution and noise due to the increase in traffic and heavy goods vehicles in particular. The roads around this area are unsuitable for a large scale increase in traffic and the large size heavy goods lorries/vehicles which would cause further damage to roads which are already constantly in need of repair. It would also create the likely hood of more road traffic accidents involving pedestrians. Many of the roads around the AB2 site are country lanes often with no/inadequate footpaths and street lighting making it unsafe for pedestrians and cyclists, making these modes of 'sustainable' transport less likely.</p> <p>Audley and the surrounding villages are not well served by public transport, First Bus do not run a bus service to Audley, it terminates at the mini-roundabout at Waterhays Estate at Chesterton and the D&amp;G Bus service is often unreliable (buses breaking down and not turning up)</p> <p>The prospect of people using public transport to commute to and from the site for work is not a realistic prospect.</p> <p>We are living in a climate crisis. The environmental impact and loss of habitat for the wildlife would be immense. How would the council mitigate for this? The site is completely out of proportion for the area. Audley has been and is a farming area and community. Why, when we need more than ever to be more self sufficient in being able to grow and produce our own food, are the County and Borough councils not promoting and encouraging first time/existing farmers to work this site for agricultural use?</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP39
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I have concerns on the following regarding extra housing and warehouses in bignall and audley that need to be considered during examination of the plan</p> <p>Poor bus service none on sundays</p> <p>Many more vehicle movments poss 400 extra cars then trucks as well will give us poor air quality and poorer roads which are full of pot holes now plus noise pollution plus projected job created means 2000 vehicle extra movements</p> <p>Poss extra 800 people living in locality when you cant get do see a doctor and they are now going to see fewer a day or dentist poor infastructure in area no shops few schools poor internet and so on</p> <p>More grean belt or land being built on will lead to flooding especially as half of gridholes and drains blocked</p> <p>Why more warehousing as may now are empty within 10 miles</p> <p>To sumerise large increase in pollution noise and air with vast increase in vehicle movments a lack of infastructure in the area and none planned loss of green spaces extra bins to collect more grass and heages to cut more roads to maintain and you dont do any now half the time Road network poor</p>
<b>Comment ID</b>	NULLP40
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I have concerns on the following regarding extra housing and warehouses in bignall and audley that need to be considered during examination of the plan</p> <p>Poor bus service none on sundays</p> <p>Many more vehicle movments poss 400 extra cars then trucks as well will give us poor air quality and poorer roads which are full of pot holes now plus noise pollution plus projected job created means 2000 vehicle extra movements</p> <p>Poss extra 800 people living in locality when you cant get do see a doctor and they are now going to see fewer a day or dentist poor infastructure in area no shops few schools poor internet and so on</p> <p>More grean belt or land being built on will lead to flooding especially as half of gridholes and drains blocked</p> <p>Why more warehousing as may now are empty within 10 miles</p> <p>To sumerise large increase in pollution noise and air with vast increase in vehicle movments a lack of infastructure in the area and none planned loss of green spaces extra bins to collect more grass and heages to cut more roads to maintain and you dont do any now half the time Road network poor</p>
<b>Comment ID</b>	NULLP41
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I have concerns on the following regarding extra housing and warehouses in bignall and audley that need to be considered during examination of the plan</p> <p>Poor bus service none on sundays</p> <p>Many more vehicle movments poss 400 extra cars then trucks as well will give us poor air quality and poorer roads which are full of pot holes now plus noise pollution plus projected job created means 2000 vehicle extra movements</p>

	<p>Poss extra 800 people living in locality when you cant get do see a doctor and they are now going to see fewer a day or dentist poor infastructure in area no shops few schools poor internet and so on</p> <p>More grean belt or land being built on will lead to flooding especially as half of gridholes and drains blocked</p> <p>Why more warehousing as may now are empty within 10 miles</p> <p>To sumerise large increase in pollution noise and air with vast increase in vehicle movments a lack of infastructure in the area and none planned loss of green spaces extra bins to collect more grass and heages to cut more roads to maintain and you dont do any now half the time Road network poor</p>
<b>Comment ID</b>	NULLP38
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barlow
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I have concerns on the following regarding extra housing and warehouses in bignall and audley that need to be considered during examination of the plan</p> <p>Poor bus service none on sundays</p> <p>Many more vehicle movments poss 400 extra cars then trucks as well will give us poor air quality and poorer roads which are full of pot holes now plus noise pollution plus projected job created means 2000 vehicle extra movements</p> <p>Poss extra 800 people living in locality when you cant get do see a doctor and they are now going to see fewer a day or dentist poor infastructure in area no shops few schools poor internet and so on</p> <p>More grean belt or land being built on will lead to flooding especially as half of gridholes and drains blocked</p> <p>Why more warehousing as may now are empty within 10 miles</p> <p>To sumerise large increase in pollution noise and air with vast increase in vehicle movments a lack of infastructure in the area and none planned loss of green spaces extra bins to collect more grass and heages to cut more roads to maintain and you dont do any now half the time Road network poor</p>

<b>Comment ID</b>	NULLP1289
<b>Order</b>	270
<b>Number</b>	Map 1
<b>Title</b>	Audley Ward Map
<b>Consultee Company / Organisation</b>	Snack In The Box
<b>Consultee Position</b>	Parts & Technical Manager
<b>Consultee Family Name</b>	Barnish
<b>Consultee Given Name</b>	Steve
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>AB2 - This is neither justified or sound, the council claim to require strategic employment land, however the allocated site exceeds this requirement significantly.</p> <p>AB2 - The volumes of traffic in and around this area are already excessive and needs to be actively addressed by our local council. By creating an industrial area of this size will add to this issue significantly. The stretch of motorway and A500 dual carriage way already has accidents on a regular basis and the additional traffic to service a site of this nature will only increase the occurrence of serious accidents.</p> <p>AB12 - This encroaches onto greenbelt land in a City where a large number of brownfield sites are left redundant and should be utilised as part of any regeneration first and foremost.</p> <p>Access to AB12 is extremely limited. As a resident of Diglake street it is already very difficult to park anywhere near my own home and the number of vehicles passing up and down the street causes major concern for my children - the dangers of this narrow road will increase significantly with additional cars/vehicles that come with more homes.</p> <p>AB12 - The road adjacent to the site, Ravens Lane is extremely busy throughout the day and considerably so during the school drop off/pick up times and during the many occasions there are issues on the A500 and M6 motorway. The area and village road network cannot cope with any additional traffic in the area without causing major disruption and a danger to local residents and children.</p> <p>AB12, AB33, AB15 - The village of Bignall End/Audley has only small village schools, a medical centre where it is difficult to get an appointment and small shops - all not able to service additional homes in the area. My children accessing these locations on the village roads is already a danger, any increase in this is a major concern.</p> <p>AB12 - The proposal documents an access route running through the park at the bottom of Diglake street. This park offers the families and children a safe place to play in a neighbourhood where the houses do not have their own gardens but small yards. The park is well used by local people and it is unjustified to take any of this community open space to accommodate access to the proposed site.</p>
<b>Q7 Modification</b>	To make the the Local Plan compliant and sound I would advise for the proposed developments AB2, AB33, AB15 & AB12 be removed and not considered viable options.

<b>Comment ID</b>	NULLP97
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Barnish
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>i am objecting the proposals to develop on sites AB2, AB33, AB15 and AB12 because I believe it is unsound. Firstly, the local area of which the proposed sites are located are specifically intended to be a rural area. For example, the parish council is titled Audley Rural Parish Council. On this note, the local schools, health centre and public services are only equipt to handle a small village population. The primary schools in particular are at capacity, and many residents struggle to get appointments at Audley Health Centre (myself and my family included).</p> <p>Secondly, the proposed sites are agricultural land which is of significant natural beauty. The residents surrrounding the sites (Eg. Diglake Street, Ravens Lane etc.) overlook beautiful views, which largely contribute to their property values. If developement were to go ahead, the values of their properties would plummet, which would largely impact the lives of many long-term residents.</p> <p>Above all, it is not within my interests or any local residents interests to have houses built here. The AB2 industrial employment site exceeds the employment land target, which therefore means there will be a future demand for more housing when people move to work here. These are only a few points that I could make, but I think I have made my point clear and I hope many other local residents will share my deep concerns.</p>
<b>Q7 Modification</b>	There would be a need for new schooling facilities, healthcare facilities, and public services to meet the demand of the new residents of the parish. This also means for parking and suitable roads. However, my primary suggestion is to not develop on these sites whatsoever. Make the AB2 site smaller as it currently exceeds employment land targets. Build elsewhere, outside of the area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I hope many others will be able to attend this to speak on behalf of my views
<b>Comment ID</b>	NULLP95
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Barnish
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>i am objecting the proposals to develop on sites AB2, AB33, AB15 and AB12 because I believe it is unsound. Firstly, the local area of which the proposed sites are located are specifically intended to be a rural area. For example, the parish council is titled Audley Rural Parish Council.</p> <p>On this note, the local schools, health centre and public services are only equipt to handle a small village population. The primary schools in particular are at capacity, and many residents struggle to get appointments at Audley Health Centre (myself and my family included).</p> <p>Secondly, the proposed sites are agricultural land which is of significant natural beauty. The residents surrrounding the sites (Eg. Diglake Street, Ravens Lane etc.) overlook beautiful views, which largely contribute to their property values. If developement were to go ahead, the values of their properties would plummet, which would largely impact the lives of many long-term residents.</p> <p>Above all, it is not within my interests or any local residents interests to have houses built here. The AB2 industrial employment site exceeds the employment land target, which therefore means there will be a future demand for more housing when people move to work here. These are only a few points that I could make, but I think I have made my point clear and I hope many other local residents will share my deep concerns.</p>
<b>Q7 Modification</b>	There would be a need for new schooling facilities, healthcare facilities, and public services to meet the demand of the new residents of the parish. This also means for parking and suitable roads. However,



	my primary suggestion is to not develop on these sites whatsoever. Make the AB2 site smaller as it currently exceeds employment land targets. Build elsewhere, outside of the area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I hope many others will be able to attend this to speak on behalf of my views
<b>Comment ID</b>	NULLP96
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Barnish
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>i am objecting the proposals to develop on sites AB2, AB33, AB15 and AB12 because I believe it is unsound. Firstly, the local area of which the proposed sites are located are specifically intended to be a rural area. For example, the parish council is titled Audley Rural Parish Council. On this note, the local schools, health centre and public services are only equipt to handle a small village population. The primary schools in particular are at capacity, and many residents struggle to get appointments at Audley Health Centre (myself and my family included).</p> <p>Secondly, the proposed sites are agricultural land which is of significant natural beauty. The residents surounding the sites (Eg. Diglake Street, Ravens Lane etc.) overlook beautiful views, which largely contribute to their property values. If developement were to go ahead, the values of their properties would plummet, which would largely impact the lives of many long-term residents.</p> <p>Above all, it is not within my interests or any local residents interests to have houses built here. The AB2 industrial employment site exceeds the employment land target, which therefore means there will be a future demand for more housing when people move to work here. These are only a few points that I could make, but I think I have made my point clear and I hope many other local residents will share my deep concerns.</p>
<b>Q7 Modification</b>	There would be a need for new schooling facilities, healthcare facilities, and public services to meet the demand of the new residents of the parish. This also means for parking and suitable roads. However, my primary suggestion is to not develop on these sites whatsoever. Make the AB2 site smaller as it currently exceeds employment land targets. Build elsewhere, outside of the area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I hope many others will be able to attend this to speak on behalf of my views
<b>Comment ID</b>	NULLP94
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barnish
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>i am objecting the proposals to develop on sites AB2, AB33, AB15 and AB12 because I believe it is unsound. Firstly, the local area of which the proposed sites are located are specifically intended to be a rural area. For example, the parish council is titled Audley Rural Parish Council. On this note, the local schools, health centre and public services are only equipt to handle a small village population. The primary schools in particular are at capacity, and many residents struggle to get appointments at Audley Health Centre (myself and my family included). Secondly, the proposed sites are agricultural land which is of significant natural beauty. The residents surounding the sites (Eg. Diglake Street, Ravens Lane etc.) overlook beautiful views, which largely contribute to their property values. If developement were to go ahead, the values of their properties would plummet, which would largely impact the lives of many long-term residents.</p> <p>Above all, it is not within my interests or any local residents interests to have houses built here. The AB2 industrial employment site exceeds the employment land target, which therefore means there will be a future demand for more housing when people move to work here. These are only a few points that I</p>

	could make, but I think I have made my point clear and I hope many other local residents will share my deep concerns.
<b>Q7 Modification</b>	There would be a need for new schooling facilities, healthcare facilities, and public services to meet the demand of the new residents of the parish. This also means for parking and suitable roads. However, my primary suggestion is to not develop on these sites whatsoever. Make the AB2 site smaller as it currently exceeds employment land targets. Build elsewhere, outside of the area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I hope many others will be able to attend this to speak on behalf of my views

<b>Comment ID</b>	NULLP1149
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Barratt
<b>Consultee Given Name</b>	Tina
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I most strongly oppose the inclusion of AB2 in the Local Plan. It is completely unjustified to allocate a site of this size (80 hectares) to fill an identified need of only 22ha</p> <p>It is unsustainable on every level, it is not sustainable, deliverable or desirable.</p> <p>Development of this site lies in the face of internationally identified concerns including</p> <ul style="list-style-type: none"> <li>• food production - we need to rely less on imports</li> <li>• habitat loss - we need to protect space for nature especially that which has evolved over millennia - no amount of petty tree planting mitigations can ever replace what would be lost</li> <li>• human health + well being - access to nature guards against physical + mental harms</li> <li>• global warming + rising sea levels - exacerbated by the removal of natural permeable surfaces and release of sequestered carbon</li> </ul> <p>The site being unjustified makes it unsound</p>
<b>Q7 Modification</b>	<p>The only way to make the plan legally compliant and sound in terms of AB2, is to remove it as a strategic employment site.</p> <p>There are more desirable locations which would better fill the identified need.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP178
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Beeston
<b>Consultee Given Name</b>	David and Anne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Anne Beeston</p> <p>AB2. PROPOSED STRATEGIC EMPLOYMENT SITE THIS HAS BEEN INCREASED IN SIZE AND IS 4 X LARGER THAN THE COUNCIL SAY THEY NEED. THERE ARE MANY OF THESE WAREHOUSES THAT ARE EMPTY, TO LET IN CREWE, ALSAGER, RADWAY AREA, NEWCASTLE AREA. THE PROPOSED SITE IS GREEN BELT WITH NARROW TWISTING LANES, ALTHOUGH ACCESS IS ON A500 AND M6 THE AUDLEY AREA WILL SEE AN INCREASE IN TRAFFIC BOTH CARS + HGV's. THE SURROUNDING VILLAGES ARE ALL TERRACED ROADS WITH CARS PARKED ON JUNCTIONS AND BENDS FROM ALSAGER'S BANK, MILES GREEN, HALMEREND, AUDLEY, BIGNALL END. STAFFORDSHIRE HIGHWAYS HAVE NOT PUT IN PLACE ANY TRAFFIC CALMING OR ACTUAL SPEED CAMERAS TO ENFORCE VEHICLES TO SLOW DOWN</p> <p>I HAVE RESORTED TO RESPONDING LIKE THIS AS I CANNOT DO THE ONLINE. I FEEL THE WHOLE CONSULTATION IS SET UP TO CONFUSE AND MAKE IT DIFFICULT FOR THE AVERAGE PERSON TO UNDERSTAND AND COMPLETE</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP176
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Beeston
<b>Consultee Given Name</b>	David and Anne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>David Beeston</p> <p>The local plan is unsound due to the Highway management for the access plan for site AB12. The planned parking plan is not sufficient to take all the current vehicles parked in Diglake Street. The number of vehicles required to park in the planned area is greater than 100 and will only increase over time. The ability to charge electric cars using owners supplies which must be made available under statutory legislation adjacent to their residence is not possible under the current plan.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I wish to be available for the hearing session to give professional assistance to the current team opposed to the plan
<b>Comment ID</b>	NULLP177
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Beeston
<b>Consultee Given Name</b>	David and Anne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Anne Beeston</p> <p>125 HOUSES ON GREEN BELT LAND WITH ACCESS ON DIGLAKE ST. IS UNSAFE. CARS PARK ON BOTH SIDES NO WHERE TO PULL IN NOW. CAR PARKING PROVIDED ON LAND IS IMPRACTICAL FOR RESIDENTS. THIS WAS REJECTED BY STAFFORDSHIRE HIGHWAYS WHEN</p>

	PUT FORWARD IN STOKE COUNCIL HAD JOINT PLAN WITH NEWCASTLE. COUNCILLOR NICK CRISP ON PLANNING PASSED THIS AND AT CONSULTATION EVEN ON 12th SEPT. DID NOT KNOW ACCESS WAS AT DIGLAKE ST- HAD NOT READ IT !! CARS PARK ON RAVENS LANE AT THE JUNCTION MAKING ACCESS + EXIT UNSAFE. THE SAME PROBLEM IS AT JUNCTION WITH ALBERT ST, BIGNALL END, AT RAVENS LANE IS REGULARLY BLOCKED WITH BUSES, HGV's BECAUSE CARS PARKED ON BOTH SIDES OF THE ROAD AND ON THE FOOTPATHS. THE FIELDS FLOOD ALSO, VICTORIAN SEWERS CANNOT COPE. THERE IS A NURSERY + SCHOOL ON CHAPEL ST ALREADY DANGEROUS AT SCHOOL HOURS. NO PEDESTRIAN CROSSINGS OR TRAFFIC CALMING IN BIGNALL END - 30mph LIMIT - 40-50mph SEEMS THE NORM. THE LOCATIONS IN THE PLAN SEEM TO BE ON STAFFS CC OWNED LAND. WILL THIS BE SOLD OFF FOR THE REVENUE. I BELIEVE SOME SITES WERE PUT FORWARD BY PRIVATE OWNERS.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP179
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Beeston
<b>Consultee Given Name</b>	David and Anne
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I HAVE RESORTED TO RESPONDING LIKE THIS AS I CANNOT DO THE ONLINE. I FEEL THE WHOLE CONSULTATION IS SET UP TO CONFUSE AND MAKE IT DIFFICULT FOR THE AVERAGE PERSON TO UNDERSTAND AND COMPLETE
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1206
<b>Order</b>	123
<b>Title</b>	Policy SE12: Amenity
<b>Consultee Company / Organisation</b>	Music Venue Trust
<b>Consultee Position</b>	National Co-ordinator
<b>Consultee Family Name</b>	Bent
<b>Consultee Given Name</b>	Lloyd
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE12
<b>Q6 Details</b>	<p>NEWCASTLE-UNDER-LYME BOROUGH COUNCIL MARSH PARADE DEVELOPMENT BRIEF COMMENTS BY MUSIC VENUE TRUST IN SUPPORT OF THE RIGGER GRASSROOTS MUSIC VENUE</p> <p>(1). MUSIC VENUE TRUST'S POSITION</p> <p>These comments have been prepared by Music Venue Trust (MVT) and respond to the consultation being undertaken by Newcastle-under-Lyme Borough Council on the draft Local Plan 2020-2040. Music Venue Trust's key concern is the impact of proposals that may come forward in the future following the adoption of this draft Local Plan as a Supplementary Planning Document (SPD); proposals that could impact on The Rigger, a grassroots music venue (GMV) and a key cultural asset in Newcastle-under-Lyme.</p> <p>MVT would like to first focus on policy TC22 (p.154): Marsh Parade, Newcastle (former Zanzibar nightclub), which allocates the land for the development of 70 dwellings and commercial units. While MVT does not oppose the development of this land in principle, we'd like to ensure that any development that does take place is done in a way that ensures the continued operation and financial viability of The Rigger and protects any potential residents from negative impact of noise typical of a thriving grassroots music venue like The Rigger which could lead to noise complaints that impact the operation of the GMV.</p> <p>MVT is pleased to see policies SE1 (p.67) and SE12 (p.90) of the draft Local Plan refer to the Agent of Change principle, as well as reference to noise assessments within policy TC22. However, no reference is made to supporting grassroots music venues and other similar cultural businesses. We would like to see more specificity with regards to issues like noise assessment and insulation when developing residential units in close proximity to existing GMVs. A key area to consider would be the need to have opening windows in residential accommodation without this subjecting the residents to unacceptable noise levels, nor prompting noise complaints from residents relating to the operation of the pre-existing GMV. Details about deeds of easement as a means to prevent noise complaints negatively impacting the operation of the existing GMV should also be addressed in order to protect the venue.</p> <p>The Rigger is a nationally recognised grassroots music venue which has been in operation for 20 years, establishing itself as central to the cultural fabric of Newcastle-under-Lyme. As such, any Local Plan adopted should set out criteria which must be followed in order to protect existing business, particularly those with cultural value. The operators of the music venue have sought to establish contact with the council in order to address noise mitigation measures for the proposed residential units on the site of the former Zanzibar nightclub, however the operators have still not been consulted. As the Local Plan potentially impacts The Rigger, the operators of the venue should be consulted in order to ensure any impact is not negative.</p> <p>MVT and the operators of The Rigger would strongly object to any future planning application in the vicinity of the venue that may impact the venue's operation or future viability.</p> <p>(2). THE AGENT OF CHANGE PRINCIPLE</p> <p>At a national level, the Agent of Change principle in the National Planning Policy Framework is very clear that the responsibility to effectively mitigate the impact of the proposed redevelopment on existing businesses falls to the developers who act as the 'Agent of Change'.</p> <p>The intention of the agent of change principle can best be seen in highlighting the following passages from the National Planning Policy Framework:</p> <p>The agent of change principle was introduced by the NPPF in 2018. Paragraph 193 of the updated NPPF (December 2023) states:</p> <p>"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."</p> <p>Other guidance within the NPPF is also a material planning consideration. Paragraph 97 states that:</p> <p>"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs"</p> <p>(3). MVT AND THE GMV SECTOR</p>



About us:  
Music Venue Trust is a UK registered charity established in 2014 that acts to protect, secure and improve the UK's Grassroots Music Venue circuit. Music Venue Trust provides advice to the government, the cultural sector and the music industry on issues impacting the network of venues and is the nominated representative that speaks on behalf of the Music Venues Alliance, an association of over 800 venues from across the UK.

Economic & Cultural Responsibility and Impact of the GMV sector:  
Music Venue Trust recognises that Grassroots Music Venues (GMVs) contribute to creating a rich cultural environment for the local community, boost the local economy and increase footfall to high streets. GMVs provide new and emerging artists and musicians with a space to hone their craft, develop their fanbase and increase access to cultural opportunities for the local community: MVT makes the case to Government and industry that they are the 'research and development' arm of the music industry. However, in the aftermath of the Covid-19 Pandemic, the economic resilience of Grassroots Music Venues has been pushed to the limit. In Music Venue Trust's 2023 Annual report we announced at Parliament the startling statistic that the average profit margin of a GMV is 0.5%, and that at its core, the provision purely of live music is a loss-making activity - one that is essentially subsidised nationally by GMVs to the tune of £114.8 million. It is other revenue streams, like the provision of food & beverages, which enable GMVs to provide their cultural activity.

GMVs and incoming neighbourhood developments:  
Our concerns for The Rigger are informed by experience and statistical analysis of the sector. The Music Venue Trust's Annual Report for 2023 shows a sharp increase in the number of noise complaints placed against grassroots music venues, and a correlation between areas of redevelopment and spikes of noise complaints.

Through this we're directly observing the impact noise complaints have on Grassroots Music Venues, the financial outlay operators have had to make as a direct result and the escalation of policing of the spaces by Environmental Health Officers. Music Venue Trust's Annual Reports for 2022 and 2023 showed an increase in the number of noise complaints placed against grassroots music venues from pre-pandemic levels, and a correlation between areas of redevelopment and spikes of noise complaints.

Over the past 20 years 35% of Grassroots Music Venues (GMVs) have closed in the UK and this is still ongoing; at the start of 2023 Music Venue Trust reported that the UK was continuing to lose GMVs at an average rate of one a week. Set against this challenging climate, we urge Newcastle-under-Lyme Borough Council to take meaningful steps to protect Newcastle-under-Lyme's successful existing GMV, The Rigger, and not add to the ongoing loss of grassroots music venue spaces both nationally and locally.

(4). Concluding points

- The Local Plan must stipulate that noise assessments be carried out by developers, with participation from the neighbouring GMV to ensure a survey captures true 'worst case scenario' data. The survey must then appropriately detail noise mitigation measures specifically in place to ensure the continued viable operation of the GMV The Rigger.
- The venue operator should be considered a key stakeholder and consulted with at every stage of the residential planning process.
- The Agent of Change principle needs to be thoroughly considered with specific reference to the impact of the development on a Grassroots Music Venue.

<b>Q7 Modification</b>	Please see representations above.
<b>Comment ID</b>	NULLP1204
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Company / Organisation</b>	Music Venue Trust
<b>Consultee Position</b>	National Co-ordinator
<b>Consultee Family Name</b>	Bent
<b>Consultee Given Name</b>	Lloyd
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>NEWCASTLE-UNDER-LYME BOROUGH COUNCIL MARSH PARADE DEVELOPMENT BRIEF COMMENTS BY MUSIC VENUE TRUST IN SUPPORT OF THE RIGGER GRASSROOTS MUSIC VENUE</p> <p>(1). MUSIC VENUE TRUST'S POSITION</p> <p>These comments have been prepared by Music Venue Trust (MVT) and respond to the consultation being undertaken by Newcastle-under-Lyme Borough Council on the draft Local Plan 2020-2040. Music Venue Trust's key concern is the impact of proposals that may come forward in the future following the adoption of this draft Local Plan as a Supplementary Planning Document (SPD); proposals that could impact on The Rigger, a grassroots music venue (GMV) and a key cultural asset in Newcastle-under-Lyme. MVT would like to first focus on policy TC22 (p.154): Marsh Parade, Newcastle (former Zanzibar nightclub), which allocates the land for the development of 70 dwellings and commercial units. While MVT does not oppose the development of this land in principle, we'd like to ensure that any development that does take place is done in a way that ensures the continued operation and financial viability of The Rigger</p>

and protects any potential residents from negative impact of noise typical of a thriving grassroots music venue like The Rigger which could lead to noise complaints that impact the operation of the GMV.

MVT is pleased to see policies SE1 (p.67) and SE12 (p.90) of the draft Local Plan refer to the Agent of Change principle, as well as reference to noise assessments within policy TC22. However, no reference is made to supporting grassroots music venues and other similar cultural businesses. We would like to see more specificity with regards to issues like noise assessment and insulation when developing residential units in close proximity to existing GMVs. A key area to consider would be the need to have opening windows in residential accommodation without this subjecting the residents to unacceptable noise levels, nor prompting noise complaints from residents relating to the operation of the pre-existing GMV. Details about deeds of easement as a means to prevent noise complaints negatively impacting the operation of the existing GMV should also be addressed in order to protect the venue.

The Rigger is a nationally recognised grassroots music venue which has been in operation for 20 years, establishing itself as central to the cultural fabric of Newcastle-under-Lyme. As such, any Local Plan adopted should set out criteria which must be followed in order to protect existing business, particularly those with cultural value. The operators of the music venue have sought to establish contact with the council in order to address noise mitigation measures for the proposed residential units on the site of the former Zanzibar nightclub, however the operators have still not been consulted. As the Local Plan potentially impacts The Rigger, the operators of the venue should be consulted in order to ensure any impact is not negative.

MVT and the operators of The Rigger would strongly object to any future planning application in the vicinity of the venue that may impact the venue's operation or future viability.

## (2). THE AGENT OF CHANGE PRINCIPLE

At a national level, the Agent of Change principle in the National Planning Policy Framework is very clear that the responsibility to effectively mitigate the impact of the proposed redevelopment on existing businesses falls to the developers who act as the 'Agent of Change'.

The intention of the agent of change principle can best be seen in highlighting the following passages from the National Planning Policy Framework:

The agent of change principle was introduced by the NPPF in 2018. Paragraph 193 of the updated NPPF (December 2023) states:

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

Other guidance within the NPPF is also a material planning consideration. Paragraph 97 states that:

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs"

## (3). MVT AND THE GMV SECTOR

About us:

Music Venue Trust is a UK registered charity established in 2014 that acts to protect, secure and improve the UK's Grassroots Music Venue circuit. Music Venue Trust provides advice to the government, the cultural sector and the music industry on issues impacting the network of venues and is the nominated representative that speaks on behalf of the Music Venues Alliance, an association of over 800 venues from across the UK.

Economic & Cultural Responsibility and Impact of the GMV sector:

Music Venue Trust recognises that Grassroots Music Venues (GMVs) contribute to creating a rich cultural environment for the local community, boost the local economy and increase footfall to high streets. GMVs provide new and emerging artists and musicians with a space to hone their craft, develop their fanbase and increase access to cultural opportunities for the local community: MVT makes the case to Government and industry that they are the 'research and development' arm of the music industry. However, in the aftermath of the Covid-19 Pandemic, the economic resilience of Grassroots Music Venues has been pushed to the limit. In Music Venue Trust's 2023 Annual report we announced at Parliament the startling statistic that the average profit margin of a GMV is 0.5%, and that at its core, the provision purely of live music is a loss-making activity - one that is essentially subsidised nationally by GMVs to the tune of £114.8 million. It is other revenue streams, like the provision of food & beverages, which enable GMVs to provide their cultural activity.

GMVs and incoming neighbourhood developments:

Our concerns for The Rigger are informed by experience and statistical analysis of the sector. The Music Venue Trust's Annual Report for 2023 shows a sharp increase in the number of noise complaints placed against grassroots music venues, and a correlation between areas of redevelopment and spikes of noise complaints.

Through this we're directly observing the impact noise complaints have on Grassroots Music Venues, the financial outlay operators have had to make as a direct result and the escalation of policing of the spaces by Environmental Health Officers. Music Venue Trust's Annual Reports for 2022 and 2023 showed an increase in the number of noise complaints placed against grassroots music venues from pre-pandemic levels, and a correlation between areas of redevelopment and spikes of noise complaints.

	<p>Over the past 20 years 35% of Grassroots Music Venues (GMVs) have closed in the UK and this is still ongoing; at the start of 2023 Music Venue Trust reported that the UK was continuing to lose GMVs at an average rate of one a week. Set against this challenging climate, we urge Newcastle-under-Lyme Borough Council to take meaningful steps to protect Newcastle-under-Lyme's successful existing GMV, The Rigger, and not add to the ongoing loss of grassroots music venue spaces both nationally and locally.</p> <p>(4). Concluding points</p> <ul style="list-style-type: none"> <li>- The Local Plan must stipulate that noise assessments be carried out by developers, with participation from the neighbouring GMV to ensure a survey captures true 'worst case scenario' data. The survey must then appropriately detail noise mitigation measures specifically in place to ensure the continued viable operation of the GMV The Rigger.</li> <li>- The venue operator should be considered a key stakeholder and consulted with at every stage of the residential planning process.</li> <li>- The Agent of Change principle needs to be thoroughly considered with specific reference to the impact of the development on a Grassroots Music Venue.</li> </ul>
<b>Q7 Modification</b>	Please see representations above.
<b>Comment ID</b>	NULLP1205
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Company / Organisation</b>	Music Venue Trust
<b>Consultee Position</b>	National Co-ordinator
<b>Consultee Family Name</b>	Bent
<b>Consultee Given Name</b>	Lloyd
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q6 Details</b>	<p>NEWCASTLE-UNDER-LYME BOROUGH COUNCIL MARSH PARADE DEVELOPMENT BRIEF COMMENTS BY MUSIC VENUE TRUST IN SUPPORT OF THE RIGGER GRASSROOTS MUSIC VENUE</p> <p>(1). MUSIC VENUE TRUST'S POSITION</p> <p>These comments have been prepared by Music Venue Trust (MVT) and respond to the consultation being undertaken by Newcastle-under-Lyme Borough Council on the draft Local Plan 2020-2040. Music Venue Trust's key concern is the impact of proposals that may come forward in the future following the adoption of this draft Local Plan as a Supplementary Planning Document (SPD); proposals that could impact on The Rigger, a grassroots music venue (GMV) and a key cultural asset in Newcastle-under-Lyme.</p> <p>MVT would like to first focus on policy TC22 (p.154): Marsh Parade, Newcastle (former Zanzibar nightclub), which allocates the land for the development of 70 dwellings and commercial units. While MVT does not oppose the development of this land in principle, we'd like to ensure that any development that does take place is done in a way that ensures the continued operation and financial viability of The Rigger and protects any potential residents from negative impact of noise typical of a thriving grassroots music venue like The Rigger which could lead to noise complaints that impact the operation of the GMV.</p> <p>MVT is pleased to see policies SE1 (p.67) and SE12 (p.90) of the draft Local Plan refer to the Agent of Change principle, as well as reference to noise assessments within policy TC22. However, no reference is made to supporting grassroots music venues and other similar cultural businesses. We would like to see more specificity with regards to issues like noise assessment and insulation when developing residential units in close proximity to existing GMVs. A key area to consider would be the need to have opening windows in residential accommodation without this subjecting the residents to unacceptable noise levels, nor prompting noise complaints from residents relating to the operation of the pre-existing GMV. Details about deeds of easement as a means to prevent noise complaints negatively impacting the operation of the existing GMV should also be addressed in order to protect the venue.</p> <p>The Rigger is a nationally recognised grassroots music venue which has been in operation for 20 years, establishing itself as central to the cultural fabric of Newcastle-under-Lyme. As such, any Local Plan adopted should set out criteria which must be followed in order to protect existing business, particularly those with cultural value. The operators of the music venue have sought to establish contact with the council in order to address noise mitigation measures for the proposed residential units on the site of the former Zanzibar nightclub, however the operators have still not been consulted. As the Local Plan potentially impacts The Rigger, the operators of the venue should be consulted in order to ensure any impact is not negative.</p> <p>MVT and the operators of The Rigger would strongly object to any future planning application in the vicinity of the venue that may impact the venue's operation or future viability.</p> <p>(2). THE AGENT OF CHANGE PRINCIPLE</p> <p>At a national level, the Agent of Change principle in the National Planning Policy Framework is very clear that the responsibility to effectively mitigate the impact of the proposed redevelopment on existing businesses falls to the developers who act as the 'Agent of Change'.</p> <p>The intention of the agent of change principle can best be seen in highlighting the following passages from the National Planning Policy Framework:</p>

	<p>The agent of change principle was introduced by the NPPF in 2018. Paragraph 193 of the updated NPPF (December 2023) states:</p> <p>“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”</p> <p>Other guidance within the NPPF is also a material planning consideration. Paragraph 97 states that:</p> <p>“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”</p> <p>(3). MVT AND THE GMV SECTOR</p> <p>About us:</p> <p>Music Venue Trust is a UK registered charity established in 2014 that acts to protect, secure and improve the UK’s Grassroots Music Venue circuit. Music Venue Trust provides advice to the government, the cultural sector and the music industry on issues impacting the network of venues and is the nominated representative that speaks on behalf of the Music Venues Alliance, an association of over 800 venues from across the UK.</p> <p>Economic &amp; Cultural Responsibility and Impact of the GMV sector:</p> <p>Music Venue Trust recognises that Grassroots Music Venues (GMVs) contribute to creating a rich cultural environment for the local community, boost the local economy and increase footfall to high streets. GMVs provide new and emerging artists and musicians with a space to hone their craft, develop their fanbase and increase access to cultural opportunities for the local community: MVT makes the case to Government and industry that they are the ‘research and development’ arm of the music industry. However, in the aftermath of the Covid-19 Pandemic, the economic resilience of Grassroots Music Venues has been pushed to the limit. In Music Venue Trust’s 2023 Annual report we announced at Parliament the startling statistic that the average profit margin of a GMV is 0.5%, and that at its core, the provision purely of live music is a loss-making activity - one that is essentially subsidised nationally by GMVs to the tune of £114.8 million. It is other revenue streams, like the provision of food &amp; beverages, which enable GMVs to provide their cultural activity.</p> <p>GMVs and incoming neighbourhood developments:</p> <p>Our concerns for The Rigger are informed by experience and statistical analysis of the sector. The Music Venue Trust’s Annual Report for 2023 shows a sharp increase in the number of noise complaints placed against grassroots music venues, and a correlation between areas of redevelopment and spikes of noise complaints.</p> <p>Through this we’re directly observing the impact noise complaints have on Grassroots Music Venues, the financial outlay operators have had to make as a direct result and the escalation of policing of the spaces by Environmental Health Officers. Music Venue Trust’s Annual Reports for 2022 and 2023 showed an increase in the number of noise complaints placed against grassroots music venues from pre-pandemic levels, and a correlation between areas of redevelopment and spikes of noise complaints.</p> <p>Over the past 20 years 35% of Grassroots Music Venues (GMVs) have closed in the UK and this is still ongoing; at the start of 2023 Music Venue Trust reported that the UK was continuing to lose GMVs at an average rate of one a week. Set against this challenging climate, we urge Newcastle-under-Lyme Borough Council to take meaningful steps to protect Newcastle-under-Lyme’s successful existing GMV, The Rigger, and not add to the ongoing loss of grassroots music venue spaces both nationally and locally.</p> <p>(4). Concluding points</p> <ul style="list-style-type: none"> <li>- The Local Plan must stipulate that noise assessments be carried out by developers, with participation from the neighbouring GMV to ensure a survey captures true ‘worst case scenario’ data. The survey must then appropriately detail noise mitigation measures specifically in place to ensure the continued viable operation of the GMV The Rigger.</li> <li>- The venue operator should be considered a key stakeholder and consulted with at every stage of the residential planning process.</li> <li>- The Agent of Change principle needs to be thoroughly considered with specific reference to the impact of the development on a Grassroots Music Venue.</li> </ul>
<b>Q7 Modification</b>	Please see representations above.

<b>Comment ID</b>	NULLP63
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Bevington
<b>Consultee Given Name</b>	Chris
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>I , as someone who has lived in [redacted by admin] till today , delight in seeing the age old baby frog / toad migration across the farm pool area across the fields into into the ponds and the families of Bats and Owls that swop across the bottom field area , the back of [redacted by admin]</p> <p>I know progress comes at a price but in this case a sensible balance is needed. Yes, housing is needed but we owe it to future generations that protected wildlife is given a safe place otherwise there generation will never see it first hand.</p> <p>I know this is a very imotive topic , but I wpuld prefer to conduct myself in a professtional and courtious manner , as you have been to me . So I have highted again , as I did in my objection that a compremise can be found.</p> <p>This way yourselves , have honoured your obligation for new housing but also protected the wildlife for future generations to see and enjoy</p>

<b>Comment ID</b>	NULLP661
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Bielby
<b>Consultee Given Name</b>	Colin
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.12
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The development of a large employment site at AB2 is both unnecessary and unviable.</p> <p>As regards transport; the site is far from public transport so will require workers to use their own private vehicles which will generate traffic for 24 hours as these will be shift workers</p> <p>similarly delivery vehicles and service vehicles will run for 24 hours and use the local roads as alternatives when the A500 and M6 have problems, which already occur regularly</p> <p>safety on the rural roads would become a negative impact</p> <p>increased traffic would have a negative effect on the rural nature of the parish</p> <p>As regards economy; available jobs are unlikely to be anything other than lower skilled and will not help the expectations of those members of the work force who aspire to more rewarding employment with better remuneration</p> <p>the site is very remote</p> <p>will impact on the viability of alternative urban sites</p> <p>harm the rural economy as there will be valuable agricultural land lost. At a time when local food growing and agricultural employment are essential</p> <p>As regards the environment there will be significant adverse impacts such as visual, noise, air quality, light pollution and general disturbance to the biodiversity</p> <p>if rural lanes are widened then there will be further loss of habitats and a decline in biodiversity</p> <p>the current site is in the greenbelt in an unsustainable situation remote from existing urban conurbations</p>
<b>Q7 Modification</b>	<p>As described above this part of the plan is unsound and completely fails to address objections given in the draft local plan.</p> <p>Please see objections from the consultation of the draft local plan also at; <a href="https://consult.newcastle-staffs.gov.uk/kse/event/37506/submission/239109/view">https://consult.newcastle-staffs.gov.uk/kse/event/37506/submission/239109/view</a></p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP662
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Bielby
<b>Consultee Given Name</b>	Colin
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.11
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The housing numbers for the Parish of Audley fail to consider the rates of births and deaths in the 2021 census which clearly shows that the population is static. By implication there is no need for an expansion of housing in this area particularly on green belt. Surveys by the Neighbourhood Plan Steering Group on "Why residents in Audley live here" gave results that the residents found the rural nature of the parish very important, and also the availability of green spaces. The proposed developments would negate these findings and reduce the appeal of the parish to both current residents and potential buyers from other areas.</p> <p>Survey results were; Only 8% are looking to move to a bigger property and only 9% to downsize over the next 5 years. From 845 respondents there were 2404 responses about most liked factors. 51% felt community spirit and friendliness were one of the best things about living in Audley Rural Parish followed by 38% the facilities (including healthcare) and 33% the countryside.</p>



	<p>From 770 respondents there were 1910 responses about least liked factors. 48% felt that parking issues were one of the things least liked about living in Audley Rural Parish followed by 25% Anti-social behaviour/crime and 20% litter/untidy looking parish.</p> <p>From 668 respondents there were 1576 responses about what they would like to see changed. 38% cited improvements with parking, 24% policing/anti-social behaviour and 21% traffic calming measures. But only 11% of the respondents are considering leaving the parish.</p> <p>The sites chosen also show a distinct lack of consideration for the local infrastructure in terms of an increase in need of schools, dental and medical practices and transport links. There will also be a vast increase in the number of private vehicles that will eventually lead to traffic problems in all three areas. The parish currently has issues with parking at Alsagers Bank, Miles Green, Halmerend and Bignall End. That at the latter will grossly exasperate residents.</p> <p>For these reasons I consider the Local Plan to be unsound and failing to co-operate.</p>
<b>Q7 Modification</b>	As described above this part of the plan is unsound and completely fails to address objections given in the draft local plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP663
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Bielby
<b>Consultee Given Name</b>	Mary
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.11
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The housing numbers for the Parish of Audley are unnecessary as the rates of births and deaths in the 2021 census show that the population is static. So there is no need for an expansion of housing in this area and definitely not at the expense of green belt.</p> <p>The sites chosen also show a distinct lack of consideration for the local infrastructure. The increase in population would cause pressure on schools, health facilities and transport links. There will also be a vast increase in the number of private vehicles that will eventually lead to traffic problems in all three areas. The parish currently has issues with parking at Alsagers Bank, Miles Green, Halmerend and Signal End. That at the latter will grossly exasperate residents.</p> <p>For these reasons I consider the Local Plan to be unsound and failing to co-operate.</p>
<b>Q7 Modification</b>	As described above this part of the plan is unsound and completely fails to address objections previously given in the draft local plan. I'm also dismayed that the objections given for the draft plan are not being re-visited as there is little change in this final plan compared to the earlier version.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP571
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Bielby
<b>Consultee Given Name</b>	Mary
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.12
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>A warehouse structure is not needed at the AB2 site . There are plenty of industrial empty warehouse sites in the vicinity which are still empty and could be used..</p> <p>As regards transport; There is no public transport near this site so workers will have to use private vehicles which will generate traffic in an area that is becoming increasingly busy anyway and with shifts traffic could be for 24 hours .</p> <p>Similarly delivery vehicles and service vehicles will run for 24 hours and use the local roads as alternatives when the A500 and M6 have problems, which already occur regularly</p> <p>Increased traffic would have a negative effect on the rural nature of the parish</p> <p>This development will harm the rural economy as there will be valuable agricultural land lost. At a time when local food growing and agricultural employment are essential</p> <p>As regards the environment,there will be significant adverse impacts such as visual, noise, air quality, light pollution and general disturbance to the biodiversity</p> <p>ilf rural lanes are widened then there will be further loss of habitats and a decline in biodiversity</p> <p>The current site is in the greenbelt and as such should remain untouched</p>
<b>Q7 Modification</b>	As described above this part of the plan is unsound and completely fails to address objections given in the draft local plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP31
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Bignell
<b>Consultee Given Name</b>	Ray
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>I wish to formally record my objection to proposed identification of this site for future development, for the following reasons.</p> <p>a) Loggerheads has already had significant housing developments in a relatively short space of time, changing significantly the nature of the village. Any proposed developments or site designation are solely profit driven and not designed to enhance village life.</p> <p>Residents no longer want this level of development to continue and local planning as a public service should recognise their wishes.</p> <p>b) This area could not support a sustainable development with no infrastructure to support it. Road links are very limited, doctors and school places limited with poor access. This point has been supported by local authorities recent rejection of a proposed housing development.</p> <p>c) Where Mucklestone Lane joins the main A road are two dangerous roundabouts used by heavy lorries and any increase in traffic levels would add significantly to the danger levels particularly as one roundabout has a school crossing point on it. The road network is unsuitable even for current levels of traffic.</p> <p>d) This land is farm land and once developed is lost forever. Any developments should first be considered for brown field sites thereby protect wildlife and quality of life for residents.</p>

<b>Comment ID</b>	NULLP568
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Billington
<b>Consultee Given Name</b>	Nick
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I remain totally opposed to any development on Keele Golf course and those adjoining sites. I have information to the effect that the value of the land of the old golf course, if sold for housing, has already been included in the boroughs budgetary planning going forwards. This presupposes the outcome of the inspection process and does not properly separate the proper function of the LPA from the boroughs ambitions as a landowner. The local save our green space group intends to raise this point at inspection. This conflict of interests raises doubts about the motivation for the proposed housing development. It suggests that the proposals have been developed not in response to the principles of proper planning but rather for budgetary reasons. I believe that the research into housing need in the area is deeply flawed. This is illustrated by the recent census which shows a population decline, and yet you are proposing to build for a healthily growing population. The council continues to recite the tired mantra of build, and they will come, where is the evidence for this? It might have been thought that the boroughs population would grow in response to the building of HS2 with its terminus in Crewe. This is not now happening; so where will the additional population come from? It is stated in the plan that the greatest need in our area is for smaller, more affordable homes. The plan proposes that 278 affordable homes will be needed per annum over the lifespan of the plan. Four hundred houses are proposed in total per annum. Thus, seventy percent of the housing need is for affordable homes. The maximum percentage of affordable homes to be delivered in new developments is thirty percent on greenfield sites. I am at a loss to understand how the plan can deliver sufficient affordable homes. This lack of consistency means the document is ineffective and not deliverable and is not in line with national policy. It fails to meet objectively assessed requirements for affordable homes. Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion. The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking!. The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. Again, the plan is not properly justified, not based on robust and credible evidence nor is it effective. In the unlikely event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible. With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are mere window dressing, in truth, many thousands of extra car journeys will be made every day. Whilst understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart. The utter failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. The proposals are sketchy at best, but if it is proposed that such a road would be open to all traffic, it is highly unlikely that the university would approve its development. This is an illustration of just one aspect of this plan which is not properly justified nor effective nor deliverable. whilst I welcome the inclusion of a country park in the plans i am concerned that the plan offers no details of how such a park would be protected for the future were it to be withdrawn from greenbelt. It is my judgement that the park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school. I am also concerned that any such 'park' may be nothing more than a land bank for further housing development. Especially in light of the proposed access to SP11 (4) and SP11 (3), from residential streets in Silverdale, I do not believe that the plan for the old golf course is effective or deliverable. I judge the risk as high that any eventual development will be of a different pattern and that the country park will not come to fruition. I judge that the borough will put financial gain before the needs of the existing population for health and recreation. The old golf course is heavily used by local people for exercise and recreation, it is the nearest and most accessible informal green space for many of the residents of the town. The needs of existing residents must be paramount in the decision-making processes</p>

	<p>of the council. Therefore, the council should reverse its proposal to build on the land and should instead make the whole area into a country park within the greenbelt. I believe that the definition of the former golf course as a "brown field site" is also flawed as the site has never previously had any built commercial or agricultural development. I believe that the plan does not take into consideration of the already built but vacant or empty homes within the city which amounts to over one thousand homes (Newcastle borough own information through freedom of information request) which could mitigate any identified housing need therefore making the plan deeply flawed. I believe the plan is deeply flawed as it does not consider the purchase of any new property situated near the university by absentee landlords, which have already been shown to purchase many of the new properties built in the location of the university. There properties are quickly converted into houses of multiple occupancy and rented out for part of the year to university students and render the neighbourhoods empty for large portions of the year, this is while Keele university are closing housing blocks and no longer supplying sufficient accommodation for their student population. The prime example of this being the development at the former metal dealers, Hamptons where much of the estate is vacant out of term time unfortunately deteriorating any possibility of a community to develop as the majority of the residents become transient. I believe the plan does not consider the impact on local school, especially the secondary school provision as there is no new secondary development.</p>
<b>Q7 Modification</b>	<p>I remain totally opposed to any development on Keele Golf course and those adjoining sites. For the reasons stated in section 6 above all proposed development of those sites should be ceased and an alternative plan should be developed The borough council should explore through compulsory purchase the one thousand plus vacant houses in the borough so that they can be brought back into use. Any financial gain from these proposed sites must not be included in current plans for the borough financial planning Any new development should be ring-fenced and only sold to local residents, a covenant should be applied to all homes prohibiting the renting out of these properties Keele university should be consulted and assisted in the planning and provision of adequate accommodation for its student population The former golf course should remain a greenbelt site and be converted into a country park, protected by law in perpetuity, giving borough residents easy access to a rewilded open space for recreational needs. The car park that currently remains locked should also be reopened providing adequate parking for residents.</p>
<b>Q8 Hearing attendance</b>	<p>Yes, I wish to participate in hearing session(s)</p>
<b>Q9 Hearing reasons</b>	<p>I think that the sessions should include people directly affected by the plan and as a local resident and frequent user of the former golf course site, I will be directly affected due to lack of green space, increased traffic and community dissolution. I think it is imperative that local people have a voice that is heard.</p>

<b>Comment ID</b>	NULLP441
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Billington
<b>Consultee Given Name</b>	Tracey
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Dear Sirs</p> <p>I remain totally opposed to any development on Keele Golf course and those adjoining sites. I have information to the effect that the value of the land of the old golf course, if sold for housing, has already been included in the boroughs budgetary planning going forwards. This presupposes the outcome of the inspection process and does not properly separate the proper function of the LPA from the boroughs ambitions as a landowner. The local save our green space group intends to raise this point at inspection. This conflict of interests raises doubts about the motivation for the proposed housing development. It suggests that the proposals have been developed not in response to the principles of proper planning but rather for budgetary reasons.</p> <p>I believe that the research into housing need in the area is deeply flawed. This is illustrated by the recent census which shows a population decline, and yet you are proposing to build for a healthily growing population. The council continues to recite the tired mantra of build, and they will come, where is the evidence for this? It might have been thought that the boroughs population would grow in response to the building of HS2 with its terminus in Crewe. This is not now happening; so where will the additional population come from? It is stated in the plan that the greatest need in our area is for smaller, more affordable homes. The plan proposes that 278 affordable homes will be needed per annum over the lifespan of the plan. Four hundred houses are proposed in total per annum. Thus, seventy percent of the housing need is for affordable homes. The maximum percentage of affordable homes to be delivered in new developments is thirty percent on greenfield sites. I am at a loss to understand how the plan can deliver sufficient affordable homes. This lack of consistency means the document is ineffective and not deliverable and is not in line with national policy. It fails to meet objectively assessed requirements for affordable homes. Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion. The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking!. The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. Again, the plan is not properly justified, not based on robust and credible evidence nor is it effective. In the unlikely event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible. With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are mere window dressing, in truth, many thousands of extra car journeys will be made every day. Whilst understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart. The utter failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. 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I remain totally opposed to any development on Keele Golf course and those adjoining sites. For the reasons stated in section 6 above all proposed development of those sites should be ceased and an alternative plan should be developed. The borough council should explore through compulsory purchase the one thousand plus vacant houses in the borough so that they can be brought back into use. Any financial gain from these proposed sites must not be included in current plans for the borough financial planning. Any new development should be ring-fenced and only sold to local residents, a covenant should be applied to all homes prohibiting the renting out of these properties. Keele university should be consulted and assisted in the planning and provision of adequate accommodation for its student population. The former golf course should remain a greenbelt site and be converted into a country park, protected by law in perpetuity, giving borough residents easy access to a rewilded open space for recreational needs. The car park that currently remains locked should also be reopened providing adequate parking for visitors to the area.

<b>Comment ID</b>	NULLP442
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Billington
<b>Consultee Given Name</b>	Tracey
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Dear Sirs</p> <p>I remain totally opposed to any development on Keele Golf course and those adjoining sites. I have information to the effect that the value of the land of the old golf course, if sold for housing, has already been included in the boroughs budgetary planning going forwards. This presupposes the outcome of the inspection process and does not properly separate the proper function of the LPA from the boroughs ambitions as a landowner. The local save our green space group intends to raise this point at inspection. This conflict of interests raises doubts about the motivation for the proposed housing development. It suggests that the proposals have been developed not in response to the principles of proper planning but rather for budgetary reasons.</p> <p>I believe that the research into housing need in the area is deeply flawed. This is illustrated by the recent census which shows a population decline, and yet you are proposing to build for a healthily growing population. The council continues to recite the tired mantra of build, and they will come, where is the evidence for this? It might have been thought that the boroughs population would grow in response to the building of HS2 with its terminus in Crewe. This is not now happening; so where will the additional population come from? It is stated in the plan that the greatest need in our area is for smaller, more affordable homes. The plan proposes that 278 affordable homes will be needed per annum over the lifespan of the plan. Four hundred houses are proposed in total per annum. Thus, seventy percent of the housing need is for affordable homes. The maximum percentage of affordable homes to be delivered in new developments is thirty percent on greenfield sites. I am at a loss to understand how the plan can deliver sufficient affordable homes. This lack of consistency means the document is ineffective and not deliverable and is not in line with national policy. It fails to meet objectively assessed requirements for affordable homes. Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion. The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking! The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. Again, the plan is not properly justified, not based on robust and credible evidence nor is it effective. In the unlikely event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible. With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are mere window dressing, in truth, many thousands of extra car journeys will be made every day. Whilst</p>

understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart. The utter failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. The proposals are sketchy at best, but if it is proposed that such a road would be open to all traffic, it is highly unlikely that the university would approve its development. This is an illustration of just one aspect of this plan which is not properly justified nor effective nor deliverable. whilst I welcome the inclusion of a country park in the plans i am concerned that the plan offers no details of how such a park would be protected for the future were it to be withdrawn from greenbelt. It is my judgement that the park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school. I am also concerned that any such 'park' may be nothing more than a land bank for further housing development. Especially in light of the proposed access to SP11 (4) and SP11 (3), from residential streets in Silverdale, I do not believe that the plan for the old golf course is effective or deliverable. I judge the risk as high that any eventual development will be of a different pattern and that the country park will not come to fruition. I judge that the borough will put financial gain before the needs of the existing population for health and recreation. The old golf course is heavily used by local people for exercise and recreation, it is the nearest and most accessible informal green space for many of the residents of the town. The needs of existing residents must be paramount in the decision-making processes of the council. Therefore, the council should reverse its proposal to build on the land and should instead make the whole area into a country park within the greenbelt. I believe that the definition of the former golf course as a "brown field site" is also flawed as the site has never previously had any built commercial or agricultural development. I believe that the plan does not take into consideration of the already built but vacant or empty homes within the city which amounts to over one thousand homes (Newcastle borough own information through freedom of information request) which could mitigate any identified housing need therefore making the plan deeply flawed. I believe the plan is deeply flawed as it does not consider the purchase of any new property situated near the university by absentee landlords, which have already been shown to purchase many of the new properties built in the location of the university. These properties are quickly converted into houses of multiple occupancy and rented out for part of the year to university students and render the neighbourhoods empty for large portions of the year, this is while Keele university are closing housing blocks and no longer supplying sufficient accommodation for their student population. The purchase of properties for students does not meet the local housing need. The prime example of this being the development at the former metal dealers, Hamptons where much of the estate is vacant out of term time unfortunately to the detriment of the community, as the majority of the residents become transient. I believe the plan does not consider the impact on local school, especially the secondary school provision as there is no new secondary development.

I remain totally opposed to any development on Keele Golf course and those adjoining sites. For the reasons stated in section 6 above all proposed development of those sites should be ceased and an alternative plan should be developed. The borough council should explore through compulsory purchase the one thousand plus vacant houses in the borough so that they can be brought back into use. Any financial gain from these proposed sites must not be included in current plans for the borough financial planning Any new development should be ring-fenced and only sold to local residents, a covenant should be applied to all homes prohibiting the renting out of these properties Keele university should be consulted and assisted in the planning and provision of adequate accommodation for its student population The former golf course should remain a greenbelt site and be converted into a country park, protected by law in perpetuity, giving borough residents easy access to a rewilded open space for recreational needs. The car park that currently remains locked should also be reopened providing adequate parking for visitors to the area.

Comment ID	NULLP73
Order	191
Title	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
Consultee Family Name	Birch
Consultee Given Name	Beverley
Q4 Part of document	Policy
Q4 Policy	Final draft local plan
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p><u><b>Comments on the Regulation 19 Draft Local Plan</b></u> consider that the draft plan is <b><i>not sound</i></b>, in particular, with reference to page 129 namely “Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads”. This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 (“the NPPF 2023”). I also challenge the soundness of the draft local plan with regard to “Policy <b><i>PSD3</i></b>: Distribution of Development” (page 16 of the draft plan) in that the numbers within this Policy have not been justified. <u><b>Summary of Reasons</b></u>1. LW53 is not a “<b><i>sustainable location</i></b>” for future housing development and is therefore contrary to national policy. <i>Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities</i>”.2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023).2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). 5. <b><i>Policy PSD3</i></b>: Distribution of Development (page 16)(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings.<i>the Borough has a need for x amount of housing and Loggerheads has to have its share</i>6. <b><i>Conclusion</i></b>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>

Birchall, Caroline

<b>Comment ID</b>	NULLP1119
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Birchall
<b>Consultee Given Name</b>	Caroline
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11 (4)
<b>Q6 Details</b>	<p>I would like to object to the proposed building work in park road as the Racecourse could not cope with the increase of traffic. It is already a busy road with the primary school. (redacted by admin) I have witnessed emergency vehicles not being able to get through. I don't object to building on the golf course but the access should be through the old golf course off Keele road. The back lane is used daily by dog walkers, it is part of the community that people meet and chat, many of them being the older community which is vital for their mental health.</p>

<b>Comment ID</b>	NULLP806
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Birchall
<b>Consultee Given Name</b>	Samuel M
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>I would like to lodge my formal objections to the proposed local plan.</p> <p>Specifically the SP11, SP23 and G&amp;T8.</p> <p>There is No suitable access for any of these developments from Racecourse. This road is already to busy and overrun, adding more traffic to this is dangerous. A suitable traffic survey should be completed.</p>
<b>Comment ID</b>	NULLP805
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Birchall
<b>Consultee Given Name</b>	Samuel M
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>I would like to lodge my formal objections to the proposed local plan.</p> <p>Specifically the SP11, SP23 and G&amp;T8.</p> <p>There is No suitable access for any of these developments from Racecourse. This road is already to busy and overrun, adding more traffic to this is dangerous. A suitable traffic survey should be completed.</p>
<b>Comment ID</b>	NULLP807
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Birchall
<b>Consultee Given Name</b>	Samuel M
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	G&T8
<b>Q6 Details</b>	<p>I would like to lodge my formal objections to the proposed local plan.</p> <p>Specifically the SP11, SP23 and G&amp;T8.</p> <p>There is No suitable access for any of these developments from Racecourse. This road is already to busy and overrun, adding more traffic to this is dangerous. A suitable traffic survey should be completed.</p>

Birks, Bernice Ann

<b>Comment ID</b>	NULLP175
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Birks
<b>Consultee Given Name</b>	Bernice Ann
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	I am writing to you to oppose these buildings as it will put such a strain on the area.... Not only on our roads, schools, shops but also taking away our green spaces. While the buildings are being built the traffic problems this will cause are horrendous. We have small narrow roads in this area.



<b>Comment ID</b>	NULLP1450
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Blairs
<b>Consultee Given Name</b>	Tracy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1390
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Blairs
<b>Consultee Given Name</b>	Tracy
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2

<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP358
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.
<b>Q7 Modification</b>	Audley should be classed as a 'Local Centre', as in previous versions of the Plan.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the plan is factually correct and therefore properly informed.
<b>Comment ID</b>	NULLP362
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	There is no mention of the National Design Guide 2021 and the ten priorities for design that it identifies. There is still insufficient emphasis on permeability, connectivity, green infrastructure and quality of the public realm. The term 'beautiful' should be removed, given the proposed changes to the NPPF.
<b>Q7 Modification</b>	Address the matters detailed above.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP366
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Appropriate densities will vary across the Borough and will be influenced by a significantly wider range of factors than those currently mentioned in the policy.
<b>Q7 Modification</b>	Incorporate a wider range of factors than those currently mentioned in the policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.

<b>Comment ID</b>	NULLP370
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Final Draft Local Plan 2020-2040 - SE1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The introduction of sites AB2 and/or AB2A will prevent compliance with this policy due to adverse impacts in relation to light, noise, air quality etc.
<b>Q7 Modification</b>	Removal of sites AB2 and AB2A from the Local Plan/this policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP354
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Final Draft Local Plan 2020-2040
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	There are factual inaccuracies and the complexity of the consultation portal has been designed to deter/prevent those affected by the Plan and who wish to provide their feedback from doing so in a simple and straight forward manner. This is an overly and unnecessarily complex mechanism for seeking feedback
<b>Q7 Modification</b>	Dramatically simplify so those you would like and who want to provide feedback are able to do so.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Inspector is fully appraised of the views of those impacted by the Local Plan
<b>Comment ID</b>	NULLP363
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Clause 7 is unclear and is therefore open to being misinterpreted.
<b>Q7 Modification</b>	Revise the wording of clause 7 to make clear your intentions.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP367
<b>Order</b>	67

<b>Title</b>	Policy EMP1: Employment
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The supporting evidence and arguments currently presented in relation to the proposed strategic employment site allocation AB2 are factually incorrect and therefore invalid. As a result, I strongly object to strategic employment site allocation AB2.
<b>Q7 Modification</b>	Ensure the proposal is based on factually accurate information and any supporting arguments presented take this into account.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP371
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	No recognition is given to or taken into account of the role of neighbourhood plans and their ability to provide more locally specific and accurate policies on heritage.
<b>Q7 Modification</b>	Take greater account of the role of neighbourhood plans.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP372
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Final Draft Local Plan 2020-2040 - Consultation
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	My views in respect of the Local Plan and the consultation process in relation to it are as per those presented to your Planning Policy Team in the letter from Urban Vision Enterprise on behalf of Audley Parish Council dated 3rd October 2024.
<b>Q7 Modification</b>	Take into account and address the matters detailed in the letter to your Planning Policy Team from Urban Vision Enterprise on behalf of Audley Parish Council dated 3rd October 2024 .
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP360



<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	There is still no recognition in relation to the role of Neighbourhood Plans in further enabling and shaping development.
<b>Q7 Modification</b>	Utilise Neighbourhood Plans to enable and shape development.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP364
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The policy focus should be widened beyond solar and wind energy to include e.g. geo-thermal energy from mineshafts as addressed in the AudleyNeighbourhood Plan
<b>Q7 Modification</b>	Widen the focus of the policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP357
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The targets for new housing in the borough and in the Audley Parish are unnecessarily high and will involve the destruction of valuable greenbelt and serve to further undermine the weaker housing markets in the Borough, Stoke-on-Trent and Crewe.</p> <p>The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land. These recent reports appear to have been ignored.</p>
<b>Q7 Modification</b>	Appropriate housing targets based on government data other current planning information currently available
<b>Comment ID</b>	NULLP361

<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The release of sites AB2 and/or AB2A from the green belt will harm green belt purposes relating to safeguarding the countryside from encroachment and assisting in urban regeneration. This is contradictory to policy PSD5.
<b>Q7 Modification</b>	Sites AB2 and AB2A should be removed from the Local Plan. They would have a significant and unnecessary detrimental impact on the green belt and add little in the way of employment that could not be addressed elsewhere (i.e. not in green belt).
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP365
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Affordable housing policy has not been applied consistently through the development management process particularly in respect of housing development in rural settlements.
<b>Q7 Modification</b>	Consistent application of the relevant policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.
<b>Comment ID</b>	NULLP369
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The policy does not reflect and therefore misaligned with current views on the mechanisms for encouraging high street recovery. Far greater emphasis on the diversification and uses that attract the members of the public into towns and high streets is required (e.g. food and drink, recreation, cultural uses, community facilities and other local facilities).
<b>Q7 Modification</b>	Ensure the policy reflects current views on the mechanisms for encouraging high street recovery.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is properly informed and factually correct.

<b>Comment ID</b>	NULLP374
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Family Name</b>	Bland
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Strategic Objectives
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The strategic objectives do not mention culture and the positive impact this can have on achieving economic transformation.
<b>Q7 Modification</b>	Ensure culture is taken into account
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure the Local Plan is factually correct and properly informed.

<b>Comment ID</b>	NULLP667
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Bloor Homes
<b>Consultee Family Name</b>	Bloor Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13.</p> <p>Policy PSD5 proposes to alter Green Belt boundaries in order to allocate a number of development sites. It is considered that this policy is justified on the basis that there is limited urban capacity in Newcastle-under-Lyme, and there is a limited amount of previously developed land available to meet development needs. In particular, there is a high level of need for affordable housing and this cannot all be met within the urban boundary.</p> <p>Exceptional circumstances to justify the release of land from the Green Belt is set out further below.</p> <p>The policy concept of what constitutes exceptional circumstances for releasing land from the Green Belt through plan making has been considered in the High Court.</p> <p>In Compton Parish Council vs Guildford Borough Council [2019] EWHC 3242 (Admin) ("The Guildford judgement") where the main general issue of the challenge was whether the Inspector, in recommending that the Local Plan be adopted, had erred in law in his approach to what constituted the "exceptional circumstances" required for the redrawing of Green Belt boundaries in a Local Plan review.</p> <p>In the Guildford judgment, Sir Duncan Ousley, sitting as a High Court Judge confirmed that:</p> <p>(a) There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.</p> <p>(b) Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.</p> <p>(c) A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.</p> <p>(d) "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."</p> <p>(e) The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.</p> <p>(f) General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.</p> <p>The above judgement confirms that there is a very broad exercise of planning judgment for the decision-maker which the courts will not readily disturb. This can include meeting the need for market housing.</p> <p>The NPPF provides more guidance (at paragraph 141) on what will add up to exceptional circumstances: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</p> <p>a) makes as much use as possible of suitable brownfield sites and underutilised land;</p> <p>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</p> <p>c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.</p> <p>In the case of Newcastle-under-Lyme, each of the above will be considered in turn below.</p> <p>Making as much use as possible of Suitable Brownfield Sites and Underutilised Land</p>

The Council recently undertook a call for brownfield sites exercise and a Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (June 2023) forms part of the evidence base. This study considered a range of vacant and infill sites, and considered the scope for the conversion of upper storey floorspace of existing commercial buildings. This study was also informed by sites identified in the SHELAA.

Paragraph 8.11 of the Issues and Options consultation document previously consulted upon, stated that evidence gathered as part of the now abandoned Joint Local Plan exercise with Stoke-on-Trent City Council suggested that approximately 2,500 dwellings could be found on land within existing development boundaries. That figure would be at least 4,660 dwellings short of the minimum housing requirement using the nationally set starting requirement of 7,160 established using the Standard Method, or 5,500 short of the Regulation 19 Local Plan requirement of 8,000 dwellings.

The latest SHELAA and Urban Capacity Study have not identified any significant amounts of further brownfield sites that were not considered previously. The latest SHELAA (dated 2024) identifies a deliverable and developable supply of brownfield sites that amount to the delivery of 1,938 homes. When other deliverable and developable greenfield sites that are not located in the Green Belt are considered, there is a capacity to deliver a further 1,012 dwellings. Mixed brownfield/greenfield sites can deliver a further 147 dwellings. This amounts to a total of 3,097 dwellings that are deliverable/already have planning permission or developable, a shortfall of at least 4,093 dwellings.

The above figures strongly suggest that land beyond existing settlement boundaries is required to deliver the Council's minimum housing requirement of 8,000 dwellings over the plan period.

Whilst national policy seeks to exhaust previously developed sites for housing delivery before releasing Green Belt sites, meeting housing needs also have to be balanced with meeting economic development needs, with many economic development needs (including, but not limited to, office, retail, leisure, manufacturing and distribution) also requiring the use of previously developed land or buildings. This is particularly true if they are located on existing employment parks or within town centres, or otherwise located where businesses require to be located based on their business needs and/or customer demands. In light of these conclusions, it is considered that the Council has made good progress in granting planning permission for residential development on sites within the development boundary, including on brownfield land, however it is very clear that minimum housing needs cannot be met on these types of sites alone.

#### Optimising the Density of Development

With regard to optimising the density of development, if limited development sites are available within existing development boundaries, then opportunities for delivering higher density development will be limited. Whilst some higher density development has occurred within Newcastle-under-Lyme town centre, other opportunities are likely to be limited due to the following factors:

- (a) Conservation areas / special character area designations.
- (b) Listed buildings and the need to appropriately take into account their settings.
- (c) Prevailing densities/character of existing residential areas, particular those of sub-urban character where high density or high rise development is likely to be inappropriate in design and amenity terms.
- (d) Other locational specific constraints.

Whilst there may be possibilities to increase the density of new development within existing urban areas or other non-Green Belt sites, it is unlikely that this could be done on a sufficient number of such sites to remove any need to release land from the Green Belt at all.

#### Meeting any Unmet Housing Needs in Neighbouring Authorities

At the time of preparing this Local Plan, a number of neighbouring authorities have recently adopted development plans. Staffordshire Moorlands adopted a Local Plan in 2020 and Cheshire East Council adopted its part 1 Local Plan Strategy in 2017. The Cheshire East Site Allocations and Policies DPD has also been recently adopted. Stafford Borough Council are currently reviewing their Local Plan, but have yet to reach examination stage. Stoke-on-Trent City Council are also in the early stages of preparing a new Local Plan.

In light of the above, the following authorities are unlikely to be in a position to accommodate any unmet needs in Newcastle-under-Lyme:

- (a) Cheshire East
- (b) Shropshire
- (c) Staffordshire Moorlands

With regard to Stafford Borough and Stoke-on-Trent, it is, at this stage, unclear what additional needs these authorities may be able to accommodate, however it should be noted that Stoke-on-Trent's minimum housing needs are currently subject to the 35% uplift for urban areas, so it is unclear if any further need from Newcastle-under-Lyme could be met within Stoke-on-Trent over the plan period. Furthermore, the Government's review of the Standard Method suggests that local housing need figures for all surrounding local authority areas could significantly increase over and above the existing Standard Method requirement if the new Standard Method is confirmed.

With regard to Stoke-on-Trent, when Newcastle-under-Lyme were pursuing a Joint Local Plan with Stoke-on-Trent City Council, Stoke-on-Trent indicated that they could accommodate around 800 dwellings of Newcastle-under-Lyme's unmet needs. This figure still remains substantially short of the housing need required in Newcastle-under-Lyme that cannot be accommodated within existing development boundaries. Stoke-on-Trent have yet to make significant progress on a new Local Plan since a consultation on Issues and Options took place between May and June 2021.

With regard to economic development needs, this will also be a material factor, particularly where economic growth factors are linked to existing employment sites that need to expand and are inextricably linked, such as Keele University and Science Park. Their expansion needs are unlikely to be able to be accommodated in other local authority areas and will need to be anchored to their existing site. As such, in addition to housing factors, there are economic development needs that won't be able to be accommodated in other local authority areas.

As set out above, meeting housing needs can amount to exceptional circumstances to justify the release of land from the Green Belt. By extension, this is also considered to apply in terms of meeting economic development needs and facilitating sustainable patterns of development in the Borough.

Having a suitable range of employment sites in suitable locations to meet future economic development needs and providing more scope to adapt to future changes in the economy therefore justify the need

	<p>to review Green Belt boundaries. For example, Newcastle-under-Lyme is well located in relation to the strategic road network, in particular the A500 and the M6. Large warehouses and distribution centres will require large sites with good access to the strategic road network, and such sites are best placed to be located outside of urban areas where access for large vehicles is likely to be more problematic. As such, it is considered that a review of the Green Belt in Newcastle-under-Lyme is necessary to meet both economic needs and housing needs.</p> <p>Promoting sustainable patterns of development is also a relevant factor to consider, as set out at paragraph 142 of the Framework, which states:</p> <p>When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.</p> <p>The above was a material factor explored at length during the examination of the Cheshire East Local Plan, with northern parts of Cheshire East heavily constrained by Green Belt designations.</p> <p>Green Belt release around the northern towns in Cheshire East was justified as follows4:</p> <p>Without alterations to the detailed Green Belt boundaries, the amount of new development that could be planned for in the north of the borough would be very low. It is considered that such a low level of development would have severe consequences including:</p> <ul style="list-style-type: none"> <li>• Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to young people and key workers being unable to stay in the area.</li> <li>• An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age.</li> <li>• Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.</li> <li>• Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area.</li> <li>• A decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.</li> </ul> <p>Some parallels can be drawn between Cheshire East and Newcastle-under-Lyme. For example, as Newcastle-under-Lyme town is currently ring-fenced by Green Belt, any substantial levels of development on non-Green Belt land outside of the development boundary would need to leapfrog the Green Belt towards the periphery of the Borough in locations such as Loggerheads, although it is acknowledged that the settlements of Baldwins Gate and Loggerheads, which are not heavily constrained by Green Belt, are considered to be sustainable locations.</p> <p>More broadly, the release of sites from the Green Belt on the periphery of the urban area in particular, such as NC13, would deliver a sustainable pattern of development that is aligned to the Council's economic growth aspirations.</p> <p>In addition, there is a substantial need to deliver an uplift in affordable housing in Newcastle-under-Lyme in light of the high level of affordable housing need, with a need to deliver a net increase of at least 278 affordable homes per annum.</p> <p>The above considerations add further weight to the case that exceptional circumstances exist to justify Green Belt release in Newcastle-under-Lyme.</p> <p>In light of the above, it is considered that Policy PSD5 is justified, as are the proposed allocations that follow from it. Bloor Homes therefore support Policy PSD5 and the release of NC13 for the delivery of around 100 dwellings.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Attachments</b>	<a href="#">1363987 Bloor Homes Appendix 2 - TMS.pdf</a> <a href="#">1363987 Bloor Homes NC13 Reps.pdf</a> <a href="#">1363987 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP665
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Bloor Homes
<b>Consultee Family Name</b>	Bloor Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes



<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13 This policy seeks to direct most development towards the urban areas of Newcastle-under-Lyme and Kidsgrove with some more limited development to the rural centres. In general terms, there is no objection to the policy presumption to directing the most development towards the larger urban centres, and other urban fringe locations, such as Harriseahead which is located on the periphery of Kidsgrove. Site reference NC13 is complementary to that strategy. In summary, it is the position of Bloor Homes that the proposed settlement hierarchy is justified
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Attachments</b>	<a href="#">1363987 Bloor Homes NC13 Reps.pdf</a> <a href="#">1363987 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1363987 Bloor Homes Appendix 2 - TMS.pdf</a>
<b>Comment ID</b>	NULLP666
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Bloor Homes
<b>Consultee Family Name</b>	Bloor Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13. As is acknowledged elsewhere in this submission, there is a substantial need for a step-change in open market and affordable housing delivery across the Borough, including in the rural areas. It should be ensured that the settlement boundaries are redrawn on the new policies maps that encompass existing development sites that have come forward on countryside sites in recent years, as well as proposed allocations. In the case of Harriseahead, the settlement boundary should be re-drawn around site allocation reference NC13.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Attachments</b>	<a href="#">1363987 Bloor Homes Appendix 2 - TMS.pdf</a> <a href="#">1363987 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1363987 Bloor Homes NC13 Reps.pdf</a>
<b>Comment ID</b>	NULLP664
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Bloor Homes
<b>Consultee Family Name</b>	Bloor Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes

<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13</p> <p>This representation is submitted on behalf of Bloor Homes in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation.</p> <p>Bloor Homes are an experienced, privately owned housing developer, and welcome the opportunity to comment on the DLP. Bloor Homes supports the Council's endeavours to prepare a new Local Plan for the Borough to guide development over the next 20 years. It is considered that the adoption of a new Local Plan is of the upmost importance for the Borough, given that Newcastle-under-Lyme Borough Council's extant Local Plan ("LP") was adopted in 2003 and so is over 20 years old. New housing allocations are very much needed to deliver a planned supply of open market and affordable housing in both the urban and rural areas in the coming years.</p> <p>The 2003 LP operated a policy of housing restraint, given that the Structure Plan requirement in force at the time had already been met by completions and commitments<sup>1</sup>. As a result of this, sites from the previous LP that did not receive planning permission were not taken forward as allocations in the extant LP2. The saved LP proposals maps demonstrate that no housing allocations were made upon adoption in 2003, save for showing previously allocated sites for which permission had been granted for residential development but had yet to be implemented. Saved Policy H10 of the LP allowed permission to be "renewed" on these sites during the plan period up to 2011.</p> <p>The subsequently adopted Core Spatial Strategy ("CSS") was a strategic planning policy document that did not allocate any housing sites. It was intended to inform the preparation of detailed site allocation plans for each of the two authorities through a Site Allocations and Policies Development Plan Document<sup>3</sup> ("SAPDPD").</p> <p>The extant LP does not reflect up to date housing needs, and in particular, does not reflect up to date affordable housing needs, nor does it contain any allocations to meet future needs.</p> <p>An up to date Local Plan that reflects up to date housing and economic development needs and allocates a sufficient amount of sites to meet for those needs is therefore essential.</p> <p>The Council must resist any pressure to remove the proposed draft allocations from the Draft Local Plan, however politically difficult that may be. The Local Plan gives the Council a choice about where to meet its housing and economic development needs, creates certainty, and ensures that future needs can be achieved in a sustainable way and delivers the associated physical and social infrastructure that is required to support such development</p> <p>Bloor Homes therefore supports the preparation of a new Local Plan, the annual housing requirement figure of 400 dwellings per annum, and the allocations proposed to help to meet the local housing requirement figure.</p> <p>This representation does not seek to make detailed comments in relation to specific development management policies proposed within the Regulation 19 Local Plan, and is submitted in support of draft allocation reference NC13, for which our client has an interest in / control over.</p> <p>Whilst it is the case that the Government is currently seeking to reform the planning system, with some reforms set to come through revisions to the NPPF and the standard method for calculating housing needs, it is the Government's position that the coverage of up-to-date Local Plans should increase. Bloor Homes therefore welcomes this consultation and supports the Council in its efforts in bringing forward a new Local Plan.</p> <p>Further to the above, Bloor Homes are mindful of the transitional arrangements proposed in the draft revised NPPF for the purposes of plan-making. Annex 1 to the draft NPPF contains implementation provisions as follows:</p> <p>"For the purposes of plan-making</p> <p>226. The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plans from [publication date + one month] unless one or more of the following apply:</p> <p>a. the emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure;</p> <p>b. the local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework;</p> <p>c. the local plan is or has been submitted for examination under Regulation 22 on or before [publication date + one month].</p> <p>Where a, b or c applies, the plan will be examined under the relevant previous version of the Framework.</p> <p>227. Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.</p> <p>228. After applying the policies of this version of the Framework, local plans that have reached Regulation 19 (pre-submission stage) on or before [publication date + one month] with an emerging annual housing requirement that is more than 200 dwellings lower than the relevant Local Housing Need figure should proceed to examination within a maximum of 18 months from [publication date].</p> <p>229. For Spatial Development Strategies, this Framework applies to strategies that reach consultation under section 335(2) of the Greater London Authority Act 1999 on or after [publication date + one month]. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework."</p> <p>Accompanying this submission is a Counsel opinion from David Manley KC (Appendix 1). This sets out that the draft Regulation 19 Local Plan for Newcastle-under-Lyme would fall squarely within exception 226(a) (as the annual housing requirement proposed in the Regulation 19 Plan is less than 200 dwellings than the Local Housing Need figure) and that the plan as currently proposed should proceed to examination. Further to this, Government Guidance on the issue of transitional arrangements provided</p>

	<p>with the consultation document: "Proposed reforms to the National Planning Policy Framework and other changes to the planning system" (updated 2nd August 2024) states, inter alia:</p> <p>"Transitional arrangements for emerging plans in preparation</p> <p>4. We propose transitional arrangements to maintain the progress of plans at more advanced states of preparation, while maximising proactive planning for the homes our communities need. These will apply differently depending on what stage of preparation the plan has reached and the extent to which it is meeting the Government's housing growth aspirations. These transitional arrangements are set out in Annex 1 of the NPPF and outlined below.</p> <p>...</p> <p>6. To help local planning authorities with advanced plans to proceed to examination at pace and support the Government's ambition to build more homes, those plans that have reached Regulation 19 publication stage but not yet been submitted for examination one month after the revised framework is published, with a gap of no more than 200 dwellings per annum between the local planning authority's revised LHN figure and its proposed housing requirement (as set out in the Publication version of the plan), should also progress to examination under the version of the NPPF it has used when preparing the plan thus far."</p> <p>The whole purpose of the transitional provisions as drafted is to strike a pragmatic balance between the need to increase housing provision on the one hand and the need to achieve Local Plan coverage and avoid wasted time and expense on the other.</p> <p>The advice from Counsel goes on to state that if the NPPF is issued in its draft form then it is an important material consideration and unless local circumstances clearly indicated a need to depart from NPPF advice it is the Government's (and PINS') expectation that it will be applied. It is therefore our position that the Newcastle-under-Lyme Regulation 19 Plan can be submitted for examination.</p> <p>Knights, on behalf of Bloor Homes, would like to participate in the examination hearings in response to the various policies and allocations for which representations are made in this submission.</p> <p>The Council's overall development strategy seeks to deliver a minimum of 8,000 dwellings over the plan period at 400 dwellings per annum. At Regulation 18 stage, the Council sought to deliver 7,160 dwellings over the plan period (358 dwellings per annum).</p> <p>The increase of the housing requirement to 400 dwellings per annum is welcome and supported, although we note the annual affordable housing need (278 affordable homes per annum) equates to around 69% of the annual housing requirement for Newcastle-under-Lyme.</p> <p>The expression of the housing requirement as a minimum starting point is welcome.</p> <p>Given the high level of affordable housing need and the Council's aspirations to deliver economic growth, it is considered that the increase in the annual housing requirement is justified by the evidence and is therefore sound.</p> <p>It is therefore suggested that, as a minimum, all the proposed allocations identified in the current DLP must be retained in order to ensure that the housing requirement can be delivered over the plan period.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Attachments</b>	<a href="#">1363987 Bloor Homes NC13 Reps.pdf</a> <a href="#">1363987 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1363987 Bloor Homes Appendix 2 - TMS.pdf</a>
<b>Comment ID</b>	NULLP668
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Company / Organisation</b>	Bloor Homes
<b>Consultee Family Name</b>	Bloor Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13.</p> <p><b>ALLOCATIONS</b></p> <p>Bloor Homes currently have land interests on the edge of Harriseahead on land to the west of Bullockhouse Road, which is proposed for allocation (NC13). This proposed allocation in the Regulation 19 Local Plan is supported.</p> <p><b>DRAFT SITE ALLOCATION NC13</b></p> <p>This site is identified as a draft allocation for around 100 dwellings.</p> <p>Policy NC13 then lists a number of criteria that need to be addressed and each of these will be considered below in turn.</p>

#### Criterion 1

Criterion 1 states that the requirements of Policy SA1 should be satisfactorily addressed. Policy SA1 sets out a number of requirements for the proposed site allocations and each will be assessed below.

#### Master Plans

A master plan is not provided at this stage, however Bloor Homes are committed to providing a master plan-led development at the time a planning application is to be prepared. Any master plan would take into account the opportunities and constraints of the site, and would set out how the site can deliver the proposed dwellings, access roads, open space, trees and landscaping whilst respecting surrounding character of the settlement.

#### Neighbourhood Plans

There is currently no adopted Neighbourhood Plan for the area, however any master plan for the site can deliver a broad mix of houstypes and sizes and would comply with relevant policies and requirements of the development plan as a whole.

#### Affordable Housing

The site is capable of delivering 30% affordable housing in accordance with the Council's emerging affordable housing policy which requires 30% affordable housing on greenfield sites. This would enable the delivery of 30 affordable homes on the site.

#### Housing Mix and Density

As set out above under Neighbourhood Plans, the site will deliver a broad mix of houstypes and these will be provided in a mix of densities to reflect the characteristics, opportunities and constraints of the site.

#### Design

A layout master plan and design has yet to be undertaken for this site, however as a starting point, Bloor Homes always looks to advance proposals for housing development of this scale and within sites of this nature with due regard to the Council's urban design guidance and an appropriate level of engagement with the LPA and local community. Bloor Homes can deliver a broad range of houstypes and sizes , and can provide appropriate houstypes in this location that are compatible with the character and appearance of the area.

#### Historic Environment

The site does not contain any listed buildings, locally listed buildings or known archaeological remains. In addition, the site is not located within the setting of designated heritage asset.

#### Social and Community Facilities

Whilst a master plan for the site has yet to be prepared, the development of the site would be able to provide on site open space, including informal areas of open space, tree planting and a local area of play.

With regard to education, the site is located within a short walking distance Thursfield Primary School. As of the 2022/2023 academic year, the school had surplus capacity to accommodate additional primary age pupils as demonstrated by the school capacity and pupil roll data below available from the Department for Education<sup>5</sup>:

(see table in attachment)

Given that the exact housing mix for the site is not known at this stage, it is not possible to assess the likely level of primary school pupils that would arise from the development of this site. In respect of other residential development proposals Knights has been involved in, the County Council has assessed housing developments of 150 dwellings generating demand for around 30-35 primary school places, so a development of 100 dwellings is likely to generate demand for a smaller number of primary school places.

With regard to secondary school provision, the site is within the catchment of Kidsgrove Secondary School. Information relating to pupil numbers and school capacity from the Department for Education web site is available covering the period 2018/19 – 2022/23. The data available is provided in the table below which demonstrates that there are a significant number of secondary school places available within the catchment.

(see table in attachment)

The above analysis demonstrates that there is sufficient capacity in local primary and secondary schools to accommodate additional development. Whilst the primary school capacity is more limited than secondary school capacity, the proximity to the primary school means that residents of any new development on NC13 would be prioritised for primary school places ahead of any parents from outside of the catchment exercising parental choice and selecting the primary school as a first preference because prospective residents would be closer to the school and therefore higher up the selection criteria in situations where the applications for school places are over-subscribed.

With regard to healthcare provision, the site is located close to the administrative boundary of Stoke-on-Trent. The nearest GP surgery from the site is located approximately 15 minute walking distance from the site. The GP surgery is the Tunstall Primary Care Packmoor Branch and is currently accepting patients<sup>6</sup>. Footways are available on the surrounding highway network that are lit that would facilitate walking to the GP surgery by those who are able to.

Whilst the GP surgery is not located in Harseahead itself, journeys to the GP surgery would be relatively short if undertaken by car. Financial contributions towards local healthcare provision can be facilitated by the development if deemed to be CIL compliant.

With regard to promoting healthy and active lifestyles, the site can provide areas of open space, play space and walking routes.

#### Landscape and Green Infrastructure

The site sits at a slightly lower level to the existing development to the east of Bullocks House Road. The land rises slightly to the north and views from Bullocks House Road into the site looking towards the south west show the site against a backdrop of existing residential development. It is considered that the greatest level of visual change would relate to the site and the very localised area immediately adjacent to the site. The effect on potential receptor groups in the wider landscape context, including users of the wider PRoW network, would be generally very limited.

The existing trees and hedgerows located in and around the site could be utilised and incorporated into any master plan-led development of the site to help to soften the appearance of new built form where

this is visible and the mitigation inherent in the design will help to assimilate the proposed development into the landscape in a manner which complements the character of the existing adjacent areas of the settlement.

Overall, the context provided by the surrounding development and the combined screening effects of topography, existing vegetation and built form means that effects on landscape character and local visual amenity would be very limited in scale.

With regard to blue infrastructure, SUDS measures, including swales and an attenuation basin to reduce surface water run off and also provide habitat could be incorporated into any proposed development, subject to the preparation of a detailed flood risk assessment and drainage strategy.

#### Biodiversity and Geodiversity

There are no known statutory ecological constraints to developing the site, subject to appropriate avoidance and mitigation measures where required.

It is anticipated that a 10% net gain in biodiversity would be achievable.

#### Highways

A transport matters statement (TMS) by Eddisons accompanies this submission (Appendix 2).

The supporting TMS demonstrates that the proposed quantum of the allocation could be served by a single point of vehicular access of Bullocks House Road. An access proposal is provided within the TMS. The proposed site access shown within the TMS incorporates a 5.5 metre wide road with 2 metre wide footways on both sides and a 6 metre junction radii. The visibility in each direction is at least 2.4 metres by 43 metres to accord with the current 30 mph speed limit. The proposed footways will connect to the existing footways on Bullocks House Road to ensure a safe and direct connection to the existing pedestrian infrastructure network in the area. Potential improvements to the local infrastructure could be discussed at a more advanced stage in the planning process to further improve the safety of the routes for pedestrians and cyclists.

In terms of pedestrian accessibility, plan 2 of the TMS provides a map showing a 2 kilometre walking distance from the centre of the site. All of Harriseahead and large parts of Kidsgrove fall within this 2 kilometre catchment. This includes bus stops, primary and secondary education, sports/leisure facilities, healthcare, public houses and retail uses.

The nearest bus stops are located around a 5 minute walk from the site. The nearest bus stops to the site provides various services throughout the day to destinations such as Hanley, Kidsgrove and Biddulph. The available services provide a choice of how people travel with the bus services operating from around 6:00am to around 7:00pm, making travel by public transport a real alternative to travelling by car for commuting trips, in particular.

Sufficient levels of parking can be provided within the development, including the provision of electric vehicle charging infrastructure to each of the proposed dwellings.

#### Environmental Health

In terms of site specific opportunities and constraints, there are no barriers to the development of the site land contamination and air quality perspective and construction related activities can be controlled by way of a construction and environmental management plan.

#### Flood Risk

Betts Hydro have provided Bloor Homes with an initial high-level overview of flood risk and drainage matters that are likely to be relevant based upon available sources of information (a flood risk and drainage strategy has yet to be undertaken).

The site is located in Flood Zone 1. Flood risk from Rivers and the Sea is very low as is the risk from reservoirs and canals. The risk from surface water varies across the site from very low to high, however it is proposed to only develop areas of lesser risk with no development in the areas of medium or high risk. The flood risk from groundwater is currently undefined, however based on topography and geology it is likely that any areas of greater flood risk will align with those areas of higher surface water flood risk so would not be proposed for development.

The flood risk from the sewers crossing the site is currently undefined but again based on topography areas of higher risk will align with the higher surface water risk so would not be proposed for development. The sewers are in locations that can be satisfactorily incorporated into the layout development and/or diverted within site. Engagement with UU as part of the pre-development enquiry will enable the most suitable solution to be established.

With development proposed only within areas at lesser flood risk and suitable mitigation measures, the flood risk to the proposed development can be considered to be very low – low from all sources of flood risk.

#### Drainage Strategy

Infiltration is not considered viable, whilst percolation testing has not been undertaken the information available is supportive of this position. The BGS geology maps and Soilscales soil classification indicate infiltration is unlikely; BGS identifies Till, Devensian – Diamicton overlaying Pennine Middle Coal Measures Formation – Mudstone, siltstone and sandstone with Soilscales identifying the soils to be 'restored soils mostly from quarry and opencast spoil' with 'drainage variable'.

It is understood that the existing runoff most likely ponds at the low point on site before a combination of natural losses occur and seepage into the existing public sewer network as there are significant assets crossing the lower location onsite where the surface water flood risk is indicated. The bed and surround of the sewers also likely provide a conduit for surface and groundwater flow.

It is proposed that the surface water runoff be discharged in the following hierarchy: -

- (a) a) the watercourse to the west, or
- (b) b) the existing public sewer network - the separate 225mm dia. surface water sewer in Merlin Way, or
- (c) c) the existing public sewer network - the combined 600mm dia. sewer crossing the site.

Peak flows are managed by restricting the stormwater runoff to the pre-development greenfield runoff rate (QBar). QBar is estimated to be 7.1 l/s/ha based on the FEH method –assuming a development area of 60%, then 1.92ha of development area results in a proposed discharge rate of 13.6 l/s.

There will be an increase in the post development runoff volume as a result of the increase in the impermeable area. This is primarily mitigated for by restricting the peak rate of runoff to QBar. It is assumed that the impermeable area of the development area is approximately 55%, then 1.056ha of



	<p>impermeable generates a stormwater storage requirement of approximately 664cu.m this can easily be provided on the site.</p> <p>The proposals will include rainwater gardens, permeable private drives and a detention basin. These features provide a range of benefits; slowing the flow, volume of storage, improve water quality as well as enhancing biodiversity and providing amenity value.</p> <p>The SuDS proposals will result in water quality that meets the requirements of the Simplified Index Approach within the CIRIA SuDS Manual (C753).</p> <p>The majority of the drainage system will be offered for adoption under a Section 104 Agreement and will be maintained by United Utilities.</p> <p>There are no existing foul water flows being generated. The proposals are to discharge the foul water generated by the proposals to the public sewer network within the site, preferred point of connection to be discussed and agreed with UU via a pre-development enquiry.</p> <p>This initial assessment has not identified any reason why the site cannot be brought forward for residential development.</p> <p><b>Utilities</b></p> <p>Suitable utility provision is available within the surrounding area, and it is anticipated that sufficient capacity is available to accommodate the proposed development or can be enhanced where required.</p> <p><b>Infrastructure</b></p> <p>The site can make the necessary contributions towards local infrastructure provision in line with Policy IN1.</p> <p><b>Minerals</b></p> <p>The site is not located within a known mineral resource area or safeguarding area.</p> <p>In light of the conclusions above, it has been demonstrated the development of 100 dwellings on this site can be delivered in a manner that would satisfy criteria 1 of Policy NC13.</p> <p><b>Criterion 2 – Access onto Bullocks House Road</b></p> <p>As set out in response to Highways under criterion 1 above, direct access with appropriate visibility splays can be provided onto Bullocks House Road</p> <p><b>Criterion 3 – Improvements along the site frontage and contributions towards bus service improvements</b></p> <p>Improvements to the site frontage can be incorporated into the final design and layout for the site, which can be master plan-led.</p> <p>In terms of contributions towards bus service improvements, it is assumed that these can be provided subject to them being CIL compliant.</p> <p><b>Criterion 4 – Landscape-led Development</b></p> <p>As set out in earlier responses, the layout of the site can be landscape-led and would take into account the topography of the site, existing landscape features and key views whilst also accommodating measures to incorporate sustainable drainage, on-site public open space and biodiversity net gain.</p> <p><b>Criterion 5 – Flood Risk</b></p> <p>The site is located in Flood Zone 1, an area with a low risk of flooding. The EA Flood Zone mapping does not show any areas of the site to be located within flood zones 2 and 3. This criterion appears to have been included in error, however in any event, the earlier commentary demonstrates that SUDS can be provided on site in accordance with a flood risk assessment and drainage strategy.</p> <p><b>Criterion 6 – Coal Mining Risk Assessment and Contamination Assessment</b></p> <p>Any development proposal would be informed by an assessment of the ground conditions which would be undertaken prior to the submission of any planning application, which would inform the design and layout of the site and the design of any proposed foundations to the proposed dwellings.</p> <p><b>Criterion 7 – Retention and Enhancement of Public Rights of Way</b></p> <p>A Public Right of Way is located to the south of the site and this could be retained as part of the development. Given its location to the site boundary, it is unlikely that a diversion of the footpath would be required, and this could be accommodated as part of any perimeter landscaping of the site, subject to further master planning work for the site.</p> <p><b>Criterion 8 – Financial Contributions</b></p> <p>These criteria require contributions towards education, healthcare provision, open space, community facilities and highway contributions.</p> <p>As set out under criterion 1 of the policy earlier in this submission, the proposal can make all of the relevant contributions towards local services and infrastructure as required (subject to them being CIL compliant).</p> <p><b>DELIVERABILITY</b></p> <p>This site is being promoted by Bloor Homes who are committed to the delivery of this site for housing as demonstrated through the submission of the planning and application and the lodging of a subsequent appeal.</p> <p>In terms of delivery, it is at this point – including factoring in the LPA's target timescales for examination and adoption of the new Local Plan, and broadly speaking - anticipated that the development of the site would come forward in the following timescales in the event that the site is allocated (with dwellings, inclusive of affordable housing being delivered at a rate of around 35 – 40 homes per annum):</p> <ul style="list-style-type: none"> <li>(a) Plan adoption final quarter of 2025 or first quarter of 2026</li> <li>(b) Submission of planning application second/third quarter of 2025</li> <li>(c) Planning permission granted final quarter of 2025/first quarter of 2026</li> <li>(d) Site preparation works – second quarter of 2026</li> <li>(e) Construction of initial access and first phase of infrastructure – second/third quarters of 2026</li> <li>(f) First phase of homes (25) delivered on site – first quarter of 2027</li> <li>(g) Completion of the development – circa 2029</li> </ul> <p>The site would therefore be deliverable within the plan period and within the first five years following its adoption.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13



<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Bloor Homes for allocation reference NC13
<b>Attachments</b>	<a href="#">1363987 Bloor Homes Appendix 2 - TMS.pdf</a> <a href="#">1363987 Bloor Homes NC13 Reps.pdf</a> <a href="#">1363987 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a>

<b>Comment ID</b>	NULLP1377
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Bostock
<b>Consultee Given Name</b>	Tim
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1433
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Bostock
<b>Consultee Given Name</b>	Tim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Concerns about damage to the environment, traffic already very heavy for small village. Schools already full to capacity and more</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP28
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Botfield
<b>Consultee Given Name</b>	Christy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>I live in (Redacted by admin) I would like to express my objections to the proposed possible access routes to the proposed housing developments. You have specified possible access routes on the Racecourse Silverdale. I would like to object to this, as I believe that this would pose safety risks to the children's primary school and would make Park road and the racecourse too busy, noisy and dangerous. I would also like to object to park road opening out and becoming a through road to cemetery road as this again will cause traffic disruption and safety concerns to what is currently a quiet village lane, which houses elderly people, disabled residents and young children. I believe that all access roads should be situated on the main keele road. Avoiding Silverdale village altogether.</p>

<b>Comment ID</b>	NULLP1356
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1412
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



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The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1358
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1413
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1441
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1384
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Brennan
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods</p>

	<p>affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP426
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Family Name</b>	Brereton
<b>Consultee Given Name</b>	Ben
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>My below submission is to express that I do not consider AB12 to be a 'sound' site allocation for development and should be removed from the local plan. My detailed reasons are as follows;</p> <p>Firstly and most concerning is the main access to the site made via Diglake Street. This immediately makes the proposed site not feasible and unsound for development. The street comprises of mainly terraced housing with no off road parking. Residents currently park part on the road and pavement with pedestrians often forced to walk in the road. An increase in the volume of cars would create a greater risk to the safety of pedestrians. The junction at the top of Diglake Street, approaching Ravens Lane has restrictive views of oncoming cars travelling up and down Ravens Lane with existing housing been at the very top of the limiting viewing angels. Cars parked on Ravens Lane close to this junction require car drivers to 'edge out' for improved viewing of oncoming traffic increasing the risk of a collision. Further use caused from more housing will only increase this collision risk, thus making proper and safe access to the site not deliverable and unsound. The current suggestions of a car park at the bottom of the street is unreasonable and untenable expecting accessible, elderly, young and parent residents to park up to 200 metres from their residence. This large development in such a small area is unsound, not effective, well justified or positively prepared and should be removed from the local plan.</p> <p>Secondly, the proposed site is home to wildlife including foxes, badgers and birds that can often be seen in the existing hedgerows that surround the perimeter of the site and also runs through the site. The houses to the south and west of the site, act as natural light barriers from Ravens lane. Building on this site will ruin the natural habitat and will expand the light and noise pollution from Bignall End onto the green belt north of the site towards Great Oak Road that sits outside the allocated AB12 site. Therefore making this site unsound. The site is in a flood zone 1 and the LPA's SFRA shows it will be at increased risk of flooding during its lifetime, there are other sites in the borough that are in zones with lower flood risk and would be a better choice requiring less impact to resolve the potential flooring risks of AB12</p> <p>Thirdly, the proposed development site sits in direct view of the Grade II listed Wedgwood Monument located around 3/4 of a mile away. This heritage site is elevated in comparison to AB12 and is clearly visible. The proposed site would visually impair the view and impact the enjoyment and heritage of the monument. This further supports that the site is not well founded and unsound.</p> <p>Lastly, the increased volume of houses will impact the already congested village that cannot cope with with further traffic, schooling or medical provisions. The main high street in Audley known as Church Street has minimal parking with patrons parking constantly on double yellow lines and on the zebra crossing. Increasing the number of housing will only increase this stress on the village until ultimately there is a fatality.</p> <p>When considering all of the above, I am of the strong opinion that AB12 is unsound, not effective, well justified or positively prepared and should be removed from the local plan.</p>
<b>Q7 Modification</b>	The modification to the plan to remove AB12 will make the plan more sound.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1166
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Brogan
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	Remove allocation of employment site AB2 from the emerging Local Plan.
<b>Attachments</b>	<a href="#">1304240_NeilBrogan.pdf</a>
<b>Comment ID</b>	NULLP1197
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Brogan
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.12
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	Remove allocation of employment site AB2 from the emerging Local Plan.
<b>Attachments</b>	<a href="#">1304240_NeilBrogan.pdf</a>
<b>Comment ID</b>	NULLP1211
<b>Order</b>	270
<b>Number</b>	Map 1
<b>Title</b>	Audley Ward Map
<b>Consultee Family Name</b>	Brogan
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	Remove allocation of employment site AB2 from the emerging Local Plan.
<b>Attachments</b>	<a href="#">1304240_NeilBrogan.pdf</a>
<b>Comment ID</b>	NULLP1203
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Brogan
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Paragraph

<b>Q4 Paragraph number</b>	13.13-13.23
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	Remove allocation of employment site AB2 from the emerging Local Plan.
<b>Attachments</b>	<a href="#">1304240_NeilBrogan.pdf</a>

<b>Comment ID</b>	NULLP189
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Bromley
<b>Consultee Given Name</b>	Graham
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP230
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Bromley
<b>Consultee Given Name</b>	Graham
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP386
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Brown
<b>Consultee Given Name</b>	Jacqueline
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>This Regulation 19 Local Plan has gone forward to consultation without the full critical evidence base and additional contextual information being available for scrutiny of elected members. It is as if the administration wishes to get this LP approved before they are subject to the new governments National Planning Framework reforms. This jeopardises the changes of this LP being passed by the Planning Inspectorate.</p> <p>I am particularly concerned about this version meeting existing housing need, especially in relation to social housing and affordable housing. If land is removed from the greenbelt, as in the case of the rewilded former Keele Golf course it should only be used to meet the housing crisis i.e. the majority of it should be social housing and the rest meet the needs of the existing population. In my opinion the level of house building will not match job growth, making the developments unsustainable. We have already seen in other wards the building of large and expensive homes that do not meet the needs of local people and either remain unsold or are under occupied by newcomers, some of whom do not contribute to the local economy. Within this plan I do specific targets for social housing and therefore cannot be said to meet genuine housing need in this area of low incomes and aging population. On p.30 there is a worrying clause about the % split of social housing ie of 400 homes only 80 would be social housing when in truth the reverse of these percentages would better reflect the genuine housing need I see as a ward councillor.</p> <p>Another grave concern is transport. There are no proposals in the LP existing pressures of connectivity. The mitigations suggested in the SWECO 2024 report are not sufficient to sustain long term traffic flow in the area. There are major concerns about pinch points at Park Rd and the Racecourse where the traffic at peak times is already too much for the existing roads. The existing school's will have their concerns about pupil numbers and dangerous levels of traffic and will no doubt make their own submissions.</p> <p>Although the mention of infrastructure to support the development on the former KGC is welcome ie doctor's surgery and one form entry primary school residents are sceptical that this will actually materialise. They have seen numerous examples of Section106 agreements not being honoured locally. Although the addition of a country park is welcome, residents enjoy using the existing rewilded site for a variety of free leisure activities eg dog walking, fishing, running. They are fearful of losing what they have. Also, there is a feeling that the country park will be in effect a 'land bank' for NULBC. Residents tell me they are worried about drainage issues as the former KGC has natural underground springs and the area is already prone to flooding.</p> <p>Finally, Silverdale as a village has not been afforded any protection, unlike Keele. The green belt is meant to prevent urban sprawl, but we will see this historic pit village swallowed up, losing its character and heritage if this plan goes ahead in its entirety.</p> <p>I have been involved in the formulation the submissions of two Parish Councils and the Labour Group of councillors on NULBC. This submission is my own and as a resident of this borough and based on my experiences as the ward councillor for Silverdale.</p>

<b>Comment ID</b>	NULLP550
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Brown
<b>Consultee Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Local Plan</p> <p>Policy AB12 Land East of Diglake Street</p> <p>The development of this land is unjustified because it is productive farmland. The UK wants to become more self-sufficient in its food production and it is vital to maintain farming in order to do this. The high water table makes the land liable to flooding and if developed with the proposed additional housing, the run off would be into Brierly Brook leading to flooding on other agricultural land. This would remove climate mitigation and contributions to our food security. Access to the site is completely inadequate with narrow roads and sharp turns at both proposed access points. The car park allocated for Diglake Street residents is much too small and would reduce the independence of elderly and disabled residents who would struggle to walk to the car park from their homes. The pavements are narrow and there would be a danger to pedestrians including children attending the nearby primary school. Construction vehicles will find it very difficult to access the site causing traffic problems and danger to residents during the building. Already the local schools, doctors and dentists are at capacity and there is just not the infrastructure to cope with these additional houses. The recent census showed a need locally for affordable housing and both starter and retirement housing. The proposed housing on AB12 does not meet this requirement. AB12 currently represents a high quality contribution to the Green Belt, if this proposal were to go ahead it would ruin the nature of this rural community as well as destroying the Green Belt habitats of many wild animals and plants.</p> <p>For the above reasons I believe the Local Plan to be unsound and I am asking that this site be removed from the Local Plan.</p> <p>The above statements in the most part also apply to:</p> <p>Policy AB33 Land off Nantwich Road and Park Lane.</p> <p>Policy AB15 Land North of Vernon Avenue.</p>
<b>Comment ID</b>	NULLP551
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Brown
<b>Consultee Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Local Plan</p> <p>Policy AB2 Land adjacent to Junction 16 of the M6</p> <p>I consider the Local Plan to be unsound on this policy for the following reasons:</p> <p>Newcastle-under-Lyme Borough Council have stated that they require 22 hectares of strategic employment land, the proposed site at AB2 allocates 80 hectares on this one site alone. This cannot be justified. The level of traffic around Junction 16 and the surrounding village roads (especially during any closures of the M6 or A500) is already too high. There are no public transport links to the site and this, in addition to logistics vehicles would greatly increase the amount of traffic on the roads. The proposed development at AB2 would require a major upgrade to the Junction and surrounding roads. Given the £22 billion shortfall in the nation's finances it is unlikely that Highways England will be in a position to fund this before the end of the Local Plan in 2040. This renders the Plan ineffective. The access to the site is to be via one point off the M6/A500 Junction. There is also to be an 'escape road' via Park Lane. I can see no way that vehicles can be prevented from using this route at busy times, leading to unprecedented levels of traffic along Park Lane, an area popular with walkers and having no footpath for much of its length. Any traffic using this route would add to the existing congestion in the village.</p> <p>There are many other warehouse developments locally, many of which stand empty and many more already under construction. There are other, Brown Belt sites in the Borough which could provide the required 22 hectares and surely we should be encouraging other forms of employment besides warehouse work (which will all be automated in the near future anyway)?</p> <p>For the above reasons I believe the Local Plan to be unsound and I am asking that this site be removed from the Local Plan.</p>

<b>Comment ID</b>	NULLP1222
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Bull
<b>Consultee Given Name</b>	Euon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is unacceptable. These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p> <p><b>Local Draft Plan</b></p> <p><b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that <i>“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”</i> In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan. Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice,</p>

hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:**



	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p> <p><b>Additional Comments:</b></p> <p>When I drive home from activities or holidays or scout camps I see the monument. I feel proud to be to belong in a tiny village on the edge of a town and if this buildings do take place behind my house it will be a town it self red street which is where I live will be upper Chesterton and my neighbour said that postman told him that this red street not Chesterton. There is a lot of mines underneath the field with shafts and tunnels. I do not like walking around busy towns like Newcastle and I love red street just the way it is now.</p>
<b>Q10 File 1</b>	6391020
<b>Q10 File 2</b>	6391053
<b>Attachments</b>	<a href="#">Consultation response form Euan Bull.pdf</a> EB

<b>Comment ID</b>	NULLP1476
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Bull
<b>Consultee Given Name</b>	Nicola
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</p> <p>Green Belt - Unsound</p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut oL from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it diLicult to cross reference. Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity. Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p>Historical Mining - Unsound</p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's. The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area. Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p>Land Ownership - Unsound</p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p>Infrastructure - Unsound</p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traLic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traLic is often speeding through the village despite existing traLic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traLic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but</p>

	<p>this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed. The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suLer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting oL access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>I am not against a local plan and agree that we need one. However, this plan does not take into account the area as a whole and reflect what draws people to the location in the first place. All the areas of focus are green belt sites without consideration of other areas that are viable options. The plan has been put into place with no consultation or consideration of the impact on the localities and whether it is practical. As outlined the impact on the infrastructure in the area will be significant, especially when taking into consideration the developments in other areas which all draw oD the same resources. The developments in Bignall End and Audley share our doctors as well as school catchment areas. Bradwell and Chesterton likewise. The plan is considering areas and not the impact for the plan as a whole which will flood the resources and make it untenable. There is already a wait for Dr's appts, a reduced NHS dental service and Schools are over subscribed or near capacity.</p> <p>The plan also does not take into account the demographic of housing needed with plans of large dwellings at the expense of single occupancy. Census shows that we having an increasing elderly population and that the number of people living in Newcastle is on the decline.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Attachments</b>	<a href="#">1337743 N Bull Reg 18 Repls.pdf</a>
<b>Comment ID</b>	NULLP1468
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Bull
<b>Consultee Given Name</b>	Nicola
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Consultation
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Regulation 19 Publication – Not Compliant with Duty to Co-operate When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow

which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is unacceptable. These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community. Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged. As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations. Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

We have since found the reg 19 notices – one is half way down Bells Hollow and facing into a field and un-readable from the road. The second is half way down Liverpool Road towards Talke, again on an open gate so unreadable from the road. Both of these Reg 19 notices are not in places of high footfall and therefore have done nothing to raise awareness in the area. This is further evidence that the Regulation 19 Publication is not compliant with Duty to Co-operate.

**Attachments**

[1337743 N Bull.jpg](#)  
[1337743 N Bull Reg 18 Reps.pdf](#)

<b>Comment ID</b>	NULLP1236
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Bull
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is unacceptable. These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community. Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p> <p><b>Local Draft Plan</b></p> <p><b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that <i>“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”</i> In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan. Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide</p>

homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

#### **Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:**

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt



	<p>assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p> <p><b>Additional Comments:</b></p> <p><b>We have since found the reg 19 notices – one is half way down Bells Hollow and facing into a field and un-readable from the road. The second is half way down Liverpool Road towards Talke, again on an open gate so unreadable from the road. Both of these Reg 19 notices are not in places of high footfall and therefore have done nothing to raise awareness in the area. This is further evidence that the Regulation 19 Publication is not compliant with Duty to Co-operate.</b></p>
<b>Q10 File 1</b>	6391054
<b>Q10 File 2</b>	6391053
<b>Attachments</b>	<a href="#">Consultation response form Paul Bull.pdf</a> <a href="#">EB</a>
<b>Comment ID</b>	NULLP1017
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Bull
<b>Consultee Given Name</b>	Paul
<b>Q6 Details</b>	Reg my previous email please see attached evidence of the poorly sited Reg 19 Notices
<b>Q10 File 1</b>	6390532
<b>Attachments</b>	<a href="#">1337744 Paul Bull.jpg</a>

<b>Comment ID</b>	NULLP49
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Newcastle-under-Lyme Borough Council
<b>Consultee Position</b>	Regeneration, Economic and Development Manager
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Elaine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	Please see attached masterplan document.
<b>Attachments</b>	<a href="#">1362971 E Burgess, NUL.pdf</a>

<b>Comment ID</b>	NULLP166
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Jeanette
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I REGARD THE AB2 SECTION OF THE LOCAL PLAN IS NOT LEGALLY COMPLIANT, SOUND OR COMPLIANT WIHT DUTY TO COOPERATE AS FOLLOWS.</p> <p>IT IS 4X LARGER THAN REQUIRED BY NEWCASTLE BOROUGH COUNCIL FOR THEIR ACTUAL NEEDS</p> <p>THERE WILL BE NO PUBLIC TRANSPORT</p> <p>THE J16 AND A500 ARE ALREADY SUBJECT TO TRAFFIC CONJESTION AND A LARGE INCREASE IN TRAFFIC WILL ONLY MAKE IT WORSE</p> <p>THE LORRY PARK FOR 100 HGVs, WHICH IS INCLUDED IN THE PLAN GREATLY INCREASE NOISE AND AIR POLLUTION</p> <p>THE 2 EMERGENCY ACCESS POINTS ARE ALSO UNSUITABLE AS THEY ARE BOTH NARROW WINDING COUNTRY LANES AND IN PLACE CONSIST OF OLY ONE LANE WIDE THERE IS ALSO NO PAVEMENTS OR STREET LIGHTS</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1024
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy PSD1 Overall Development Strategy – Windfall Housing numbers</b></p> <p>The current Regulation 19 document proposes an additional 8000 dwellings over the plan period which would exceed the requirements of the NPPF (December 2023) but would be significantly below the number of new dwellings to meet the requirements of the most recent New Standard Method. We suggest that it would be preferable to continue with the housing numbers included in the current Regulation 19 document and for the Inspector to proceed on the basis that additional sites to meet the new requirements will be found in an early review by the Council - subject to a later solely site-specific Examination (rather than a complete review of the plan).</p> <p>We have do have major concerns in respect of the Windfall Assumptions in Table 2 which includes a Total Windfall Allowance of only 372 over the remaining plan period. We acknowledge that this is an improvement over the Regulation 18 document - which made no windfall allowance whatever.</p> <p>We acknowledge that windfall numbers will fall once there is a Local Plan in place but not all sites where development would be acceptable and gain planning permission would be allocated and experience has shown that windfalls remain significant.</p> <p>We accept what is said in Paragraph 4 of the policy which reads:</p> <p>The Council will encourage the efficient use of land through windfall development, including the redevelopment / re-use of previously developed land and buildings, where the development: -</p> <ol style="list-style-type: none"> <li>1 Considers the landscape / townscape character of the existing surroundings when determining the character and density of development;</li> <li>2 supports the creation of high quality: beautiful and sustainable buildings and places;</li> <li>3 Is physically well-related to existing settlements, infrastructure and sustainable transport modes; and</li> <li>4 Does not require major investment in new infrastructure. Where this is unavoidable, the delivery of development should be co-ordinated (including the use of phasing) to coincide with new infrastructure provision</li> </ol> <p>We agree with this approach and accept what is said in the Regulation 19 document:</p> <p>5.5 Sites which are delivered without being identified or allocated in a Plan are known as 'windfall' development. Consistent with the NPPF, a windfall allowance has been made as part of the housing land supply for the Local Plan. The allowance is based on robust evidence established through the preparation of the Council's Strategic Housing Land Availability Assessment (SHLAA), the monitoring of historic windfall delivery rates and expected future trends.</p> <p>Windfall Development and Allowance</p> <p>5.7The NPPF states that "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area" (NPPF, Paragraph 72, p20).</p> <p>The Council has never prepared a Local Plan and has relied on the Joint Core Strategy, adopted in 2009, which did not make any allocations and only referred to acceptable locations for development:</p> <p><i>" 1.3 This document concerns the strategy at the heart of the new plan making system The Core Spatial Strategy. This strategy sets out the overarching spatial planning</i></p>

framework for the long term regeneration of the Borough of Newcastle-under-Lyme and City of Stoke-on-Trent for the period up to 2026 (the plan period). It seeks to ensure that public and private investment is properly co-ordinated with a focus on promoting the principles of sustainable development. It is a technical not marketing document and tries to balance competing claims for change.

1.4 Both Councils, based on the framework provided by this overall strategy are preparing other more detailed plans for parts of their areas or to deal with particular planning topics. More detail on the range of new planning documents that are being prepared can be found in the Local Development Schemes published each year by both planning authorities to programme plan making work. A glossary of technical terms is provided at Appendix 1."

**Strategic Housing Targets**

5.25 The table below shows the estimated build rates necessary to meet the housing needs of the plan area. The area spatial strategies that follow provide more detail regarding the distribution of housing throughout the plan area. They will also indicate how the area spatial strategies may accommodate additional housing provision arising from the RSS Revision process through to approval.

The Table shows a net requirement for NuL of 5700, projected demolitions of 557 and a gross requirement of 6257 and a gross annual requirement of 313 dwellings.

We have tried (unsuccessfully) to find published annual completion rates for Newcastle-under Lyme Borough with a breakdown of sites considered to be allocated and those regarded as being windfalls. We note, however, that the Council has published its assessment of windfall totals.

The Council has compelling evidence that windfall sites provide a reliable source of supply in Newcastle-under-Lyme. Table 3 below shows the past trends in windfall site completions since 2008. These typically comprise changes of use, conversions and sites not already identified in the published SHLAA.

Table 3: Calculation of the windfall allowance

Year	Windfall Completions Sites not identified in the SHELAA but Inc. COU/CON
2008-09	48
2009-10	47
2010-11	21
2011-12	27
2012-13	31
2013-14	33
2014-15	26
2015-16	61
2016-17	253
2017-18	40
2018-19	60
2019-20	32
2020-21	54
2021-22	120
2022-23	87
Total	940
Average per year	62.67

Considering the monitoring data presented in Table 3, a windfall allowance of 62.67 dwellings per year for years 2025/26 and 2026/27 of the five-year period has been included in the housing land supply calculation. A total windfall allowance of 125 is therefore applied for the last two years of the five-year supply period. This avoids double counting of existing planning approvals which are likely to be built during the preceding three years.

The historic average is quoted as 62.67, yet the proposed windfall allowance proposed in the plan is a total of only 372. Experience in other districts in the county has shown that, even with the existence of allocated sites, windfall numbers remain higher than anticipated.

1 NPPF (Dec 2023 Extract) - No change is proposed (other than paragraph number) in the recent consultation (July-September 2024) on the revised NPPF.

	72.73. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. ...
<b>Q7 Modification</b>	The Inspector is requested to propose a recommended Modification to the Plan that the windfall allowance is significantly increased.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	If the Inspector considers this issue at a hearing session, to explain why we consider it important and relate this to previous experience and to take part in any discussion.
<b>Comment ID</b>	NULLP1022
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b><u>Artificial Intelligence</u></b></p> <p>In the light of the Planning Inspectorate Guidance dated 6 September 2024 regarding the use of AI, we wish to state that AI has not been used in any of the representations from CPRE Staffordshire. We consider it to be highly unlikely that we will use AI in the Examination process. If AI is used, we will fully comply with the seven bullet points in the guidance.</p> <p><b><u>Taking part in the Local Plan process</u></b></p> <p>We have indicated in individual representations that we wish to be heard at the Examination. We will respond to any invitation from the Inspector to provide written statements. We are happy with the Inspector's preference for the most appropriate formats for the hearings; real, virtual, or blended. In virtual and/or blended sessions we are happy to use Zoom or Teams to participate. (We have not previously used telephone conference but can learn how to do this.) Generally, we would prefer virtual to 'in person'.</p> <p><b><u>Policy PSD1 Overall Development Strategy</u></b></p> <p>The proposals in PSD1 are highly unlikely to meet the New Government's housing requirements using the proposed new Standard Method because the methodology has changed radically.</p> <p>For local planning authorities in Staffordshire this will result in significantly increased housing requirements. In the case of NuLBC the requirements are expected to be 593 dwellings per year, whilst the proposal in the Regulation 19 documents is 400+ dwellings per year. (Table 2 on Page 14 of the current document shows 8663 new dwellings in the 20-year plan period.)</p> <p><b>We appreciate that this major change was unknown to NuLBC in preparing the plan but suggest that the Inspector could reasonably make a modification to the required number rather than allowing the Plan to remain demonstrably non-compliant and unsound.</b></p> <p>These representations are made in the early months of the new Government.</p> <p>The Plan is unusual in that the Regulation 19 consultation was committed to publication before the new Government published the consultation on the Draft NPPF; the Council's consultation started shortly after it.</p> <p>It is unclear whether the plan will be progressed by the LPA, having considered the representation as it has gone to publication, and then sent to the Inspectorate, or whether will be withdrawn for revision, for example to take account of policy changes in the revised NPPF. (We hope that the plan will be sent to the Inspectorate in its Regulation 19 form).</p> <p>At the time of making these representations, we cannot know whether, if the plan is sent to the Inspectorate in its existing form, the Inspectorate will be prepared to progress it to Examination. (We hope that it would be allowed to proceed.)</p> <p>As Council has never previously prepared and adopted a Local Plan, there is no statutory development plan currently effective in the Borough and we would suggest</p> <p>that it is highly desirable for the current document to proceed to Examination, with modifications made in accordance with the Inspector's recommendations, rather than re-starting the process and causing further delay.</p> <p>It seems highly likely that a new NPPF will be published before the Examination. It would be helpful for both the council and the Planning Inspectorate to accept that the Plan be considered under the new</p>



	<p>NPPF (and other guidance published by the Government) - and that this should be made clear to all representees well in advance of the Examination.</p> <p>(It seems to us that unless the Inspector takes the new NPPF into account in making recommended modifications the plan will inevitably be unsound as it would not be compliant with the then current NPPF).</p> <p>We realise that the anticipated (mandatory) housing requirements under the revised New Standard Method will be significantly higher than under either the existing NSM or the proposals included in the Regulation19 document. We have tried to take this into account in our representations. However, we foresee that if the plan were to be adopted as meeting NPPF requirements and the Inspector's recommended modifications but without fully meeting the NSM requirements, the Council could be required to prepare an early review purely to propose additional housing provision. This could be subject to a later, separate, Examination.</p>
<b>Q7 Modification</b>	<p>It seems highly likely that a new NPPF will be published before the Examination, and it would be helpful for both the Council and Planning Inspectorate to accept that the Plan be considered under the new NPPF (and other Government published guidance). This should be made clear to all representees well in advance of the Examination.</p> <p>As we realise that representations implying support will not be heard, this representation should be considered as saying that the current Regulation 19 plan is unsound (but that it could become sound if the Inspector's main recommendations took account of the NPPF and other Government policy in force at the time of the Examination).</p> <p>We recognise that the modifications will be dependant on the relevant Government policy at a specific date determined by the Inspectorate.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>If a hearing session takes place, we would wish to attend to put or support the case for new Government policy to be considered at the Examination.</p> <p>If there is open discussion between the LPA and Inspectorate in deciding how to proceed, we would like to be invited to observe.</p>
<b>Comment ID</b>	NULLP1026
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy HOU1 Affordable Housing</b></p> <p>We consider that the proposed policy fails to meet the requirements of either the current NPPF or the Consultation NPPF, particularly with regard to:</p> <ol style="list-style-type: none"> <li>1 Delivering a sufficient supply of homes</li> </ol> <p>For example:</p> <ol style="list-style-type: none"> <li>1 Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (<i>including the minimum proportion of Social Rent homes required</i>), and expect it to be met on-site unless: <ol style="list-style-type: none"> <li>2 a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and</li> <li>3 b) the agreed approach contributes to the objective of creating mixed and balanced communities.</li> </ol> </li> </ol> <p><i>(Italicisation shows the proposed addition in the Consultation Draft).</i></p> <p>The policy does not specify the type of affordable housing required, other than referring to First Homes and their minimum discount. We recognise that this is referred to in paragraph 7.4 of the Regulation 19 document:</p>

	<p>7.4 The Housing Needs Assessment (HNA, 2024) identifies an annual need for 278 affordable homes throughout the Borough of Newcastle-under-Lyme over the plan period to 2040. Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time.</p> <p>However, this is simply not reflected, or given effect to, in Policy HOU1.</p> <p>It is also considered that the percentage for affordable housing in 1a of the Policy is too low.</p> <p><i>Note:</i></p> <p><i>We have concerns in relation to 1a. as we consider that the percentage proposed falls below what should be required.</i></p> <p><i>Newcastle-under-Lyme Housing and Economic Needs Assessment. Further Update. April 2024</i></p> <p><i>Need for affordable housing</i></p> <p><i>5.13 The HENAU drew upon the latest information available in early 2023 to recalculate the need for affordable housing in Newcastle-under-Lyme, updating the assessment presented in the original HNA. It concluded that circa 278 affordable homes would be needed annually throughout the borough, between 2022 and 2040.</i></p>
<b>Q7 Modification</b>	The Policy is fundamentally unsound at present. We request that, in the Main Modifications following the Examination, the Inspector amends the proposed policy to reflect Government policy, to specify the type of affordable housing, to increase the percentage requirement for affordable housing, and to take account of Paragraph 7.4 referred to above.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To engage in the discussion if this issue is to be the subject of a hearing session.
<b>Comment ID</b>	NULLP1023
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy PSD1 Overall Development Strategy</b></p> <p>The proposals in PSD1 are highly unlikely to meet the new Government's housing requirements using the proposed new Standard Method because the methodology has changed radically.</p> <p>For local planning authorities in Staffordshire this will result in significantly increased housing requirements. In the case of NuLBC the requirements are expected to be 593 dwellings per year whilst the proposal in the Regulation 19 documents is 400+ dwellings per year. (Table 2 on page 14 of the current document shows 8663 new dwellings in the 20-year plan period).</p> <p><b>We appreciate that this major change was unknown to NuLBC in preparing the plan but suggest that the Inspector could reasonably make a modification to the required number rather than the Plan be allowed to remain demonstrably non-compliant and unsound.</b></p> <p>These representations are made in the early months of the new Government.</p>

	<p>The Plan is unusual in that the Regulation 19 consultation was committed to publication before the new Government published the consultation on the Draft NPPF. The Council's consultation started shortly after the NPPF consultation opened.</p> <p>It is unclear whether the plan will be progressed by the LPA having considered the representation as it has gone to publication and will then be sent to the Inspectorate or will be withdrawn for revision, for example to take account of policy changes in the revised NPPF. (We hope that the plan will be sent to the Inspectorate in its Regulation 19 form).</p> <p>At the time of making these representations, we cannot know whether, if the plan is sent to the Inspectorate in its existing form, the Inspectorate will be prepared for the plan to progress to Examination. (We hope that it would be allowed to proceed.)</p> <p>Particularly in the light of the Council having never previously prepared and adopted a Local Plan there is no statutory development plan currently effective in the Borough. We would suggest that it is highly desirable for the current document to proceed to Examination with modifications made in accordance with the Inspector's recommendations rather than re-starting the process and causing further delay.</p> <p>It seems highly likely that a new NPPF will be published before the Examination and it would be helpful for both Council and the Inspectorate to accept that the Plan be considered under the new NPPF (and other Government published guidance). This should be made clear to all representees well in advance of the Examination.</p> <p>(It seems to us that unless the Inspector takes the new NPPF into account in making recommended modifications the plan will inevitably be unsound as it would non-compliant with the then current NPPF.)</p> <p>We realise that the anticipated, mandatory, housing requirements under the revised New Standard Method will be significantly higher than under either the existing NSM or the proposals included in the Regulation 19 document. We have tried to take this into account in our representations but can foresee that if the plan could be adopted as meeting NPPF requirements and the Inspector's Recommended Modifications but without fully meeting the NSM requirements, the Council could be required to prepare an early review purely to propose additional housing provision. This could be subject to a later, separate, Examination.</p>
<b>Q7 Modification</b>	<p>It seems highly likely that a new NPPF will be published before the Examination and it would be helpful for both Council and Inspectorate to accept that the Plan be considered under the new NPPF (and other Government published guidance). This should be made clear to all representees well in advance of the Examination.</p> <p>We realise that representations implying support will not be heard so we wish this representation to be considered as saying that the current Regulation 19 plan is unsound now and will be unsound (but that it could become sound if the Inspector's Recommendations took account of the NPPF and other Government Policy in force at the time of the Examination).</p> <p>The Main Modifications would be dependent on the relevant Government policy at a specific date determined by the Inspectorate.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	If a hearing session takes place, to attend to put or support the case for new Government policy to be considered at the Examination.
<b>Comment ID</b>	NULLP1027
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy AB2: Land at Junction 16 of the M6</b></p> <p>Removal of 80ha of Green Belt comprising a large greenfield area, in agricultural use, in open countryside, clearly separated from the urban area or other settlements area and for its proposed development.</p>

## **National Policy**

National Planning Policy framework (December 2023)  
extracts (our underlining).

Paragraph 142. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 143. Green Belt serves five purposes:

- 1 a) to check the unrestricted sprawl of large built-up areas;
- 2 b) to prevent neighbouring towns merging into one another;
- 3 c) to assist in safeguarding the countryside from encroachment;
- 4 d) to preserve the setting and special character of historic towns; and
- 5 e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**We would suggest that c) is of greatest relevance to this representation although e) may also be relevant.**

- 1 Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non- strategic policies, including neighbourhood plans.
- 1 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
  - 2 a) makes as much use as possible of suitable brownfield sites and underutilised land;
- ...
- 1 c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

**Put simply, we do not consider that exceptional circumstances have been evidenced and justified and we see no need for the removal of the site from the Green Belt.**

We recognise that the new Government has made clear its intention to revise NPPF and has published its proposed NPPF for consultation (now concluded).

We acknowledge that the proposed changes to the NPPF in Paragraphs 145 (142 in the consultation document), Para 147 (144), Para 150 (147) and new Paragraph 152 in the consultation document are significant. However, we believe that our representations remain valid and relevant to both the existing NPPF and its anticipated replacement and we ask to be heard at the Examination in the context of either the current NPPF (December 2023), its replacement, or both documents.

In the context of the introduction of Grey Belt in the consultation document, we would wish to make it clear that we have no doubt that the site could not be considered to be Grey Belt under the definition given in Annex 1 of the NPPF consultation document:

Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).

The land comprised in Policy AB2 is clearly not Previously Developed Land. As clearly stated above, the site makes a significant contribution to the Green Belt.

## **Other policies in the NPPF relevant to this proposal**

The extracts are from the NPPF consultation.

Strike-through shows proposed deletions, underlining shows proposed text.

~~147.144~~the Green Belt or towards locations beyond the outer Green Belt boundary. Where it ~~has been concluded~~ that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

~~150.147.~~ Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations and is released for development through plan preparation or review, development proposals on the land concerned should deliver the contributions set out in paragraph 155 below.

~~152.149.~~ Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

~~153.150.~~ When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the.

- The site is entirely Greenfield, in agricultural use, and could not reasonably be described as previously developed land or 'Grey Belt'.
- No evidence is presented in the plan sufficient to justify the removal of the 80 hectare site from Green Belt.

**We suggest that the proposal conflicts with both the existing NPPF and policies under consideration by the Government and that Very Special Circumstances do not exist in this case.**

**The following representations give the reasoning for our not considering that there are very special circumstances in this case to overcome the presumption against inappropriate development. In the representations we refer to the evidence documents published by the Council, and others.**

#### **The Council's own strategy and policies**

- We agree with the Council's statement that '*Development proposals should maximise the use of existing resources and infrastructure to allow jobs, homes and other facilities to be located close to each other and be accessible by public transport*'. **The site fails on all these grounds. Policy PSD2.**
- We also agree that *The rural economy is a key asset of the Borough and will have grown stronger through the Plan period, based primarily on agriculture but supplemented by appropriate rural diversification, where justified...* **The site also fails on this criteria as it cannot reasonably be considered to be rural diversification (Policy PSD2).**
- The proposal fails to satisfactorily address the site allocation requirements set out in Policy SA1 (General Requirements).

#### **The Location**

- The site is some distance from population centres.
- The site is visually prominent and the proposed development would be highly intrusive in the landscape.
- The site is totally isolated from other development and completely free-standing in the countryside.
- The only means of access is from the A500, a high-speed dual carriageway.
- The A500 in the vicinity of the site has no facilities for pedestrians or cyclists.
- The A500 has no safe crossing points for pedestrians or cyclist near to the proposed site.
- The site is not served by public transport.

**It is considered that these, and other factors raised by other representees, also mitigate against the allocation of the site.**

**The site is not required and is unjustified by the evidence.**

**Newcastle-under-Lyme Housing and Economic Needs Assessment Further Update  
April 2024**

*Authors: Turley*

## **Executive Summary: (Extract)**

### **Need for employment land**

- 1 *This report has also reconsidered the amount of employment land that could be needed in Newcastle-under-Lyme, factoring in the latest employment forecasts and the extra year of take-up data that has become available since the HENAU was produced.*

*17. It suggests that between 43.1ha and 83.0ha of employment land could be needed throughout the borough between 2023 and 2040, effectively reinforcing the range presented in the HENAU (36.5-68.8ha) – for a slightly different period (2022-40) – but markedly elevating its upper end.*

- 1 *In a technical sense, provision at the lower end of the range (43.1ha) would directly align with the standard method, accommodating the jobs that could be supported mainly through changing behaviours where this report's modelling suggests that this scenario would bring limited growth in the working age population. The forecasts introduced in section 5 suggest that more jobs could be reasonably expected, at an average rate of 237 jobs per annum, and this would not only require the provision of 400 dwellings per annum – to sufficiently grow the labour force – but could also require around 48.2ha of employment land. Either of these scenarios would though slow the recent rate of take-up, with provision towards the upper end of this range (63.3-83.0ha) more likely to mitigate this risk without necessarily creating more jobs.*
- 1 *While need has increased, the supply of employment land has contrastingly continued to reduce, standing at only 48.9ha as of March 2023. Much of this supply is also expected to be imminently lost, or not come forward according to Aspinall Verdi, such that as little as 18.1ha could be available in the coming years.*

*20. This suggests that there is likely to be a quantitative shortfall of employment land in Newcastle-under-Lyme, requiring the identification of new sites to clear it. There also continues to be an issue with the quality of the remaining supply, with Aspinall Verdi having classified most sites as “average” based on criteria devised by the Council.*

- 1 *The need for different types of employment land has also been reviewed, at a high level. This indicates that there is at least a quantitative or qualitative shortage of offices, industrial space and warehouses, requiring the Council to consider opportunities to add new sites to its existing supply.*
- 1 *This report has also briefly considered new sites that the Council believes could in future form part of its supply. Reference has been made to such sites in considering how they are positioned to potentially respond to evidenced need, but it is important to recognise that it is the role of policy – rather than this study – to allocate them. The Council is encouraged to remain positive in considering other sites, beyond those it has already identified, where they respond to the evidenced market need and demand.*

### **Potential impact of strategic sites**

- 1 *While the above has effectively updated parts of the HENAU, this report has a slightly broader scope with the Council now requiring advice on how the allocation of a strategic site – still under consideration – could potentially impact upon the need for housing in Newcastle-under-Lyme.*
- 1 *This report's modelling suggests that there is unlikely to be surplus labour to support job growth beyond the baseline forecast, if the Council either aligns with the outcome of the standard method (347dpa) or plans to support that forecast by providing 400 dwellings per annum.*
- 1 *It is nonetheless possible that the higher of these two options could result in there being sufficient labour to service a strategic site, albeit this is difficult to definitively prove and would require careful monitoring over the plan period. Jobs created on such a site may not be wholly additional to a baseline that itself allows for a marked improvement from past trends in sectors such as logistics, in a possible reflection of the borough's ability to play a more strategic role. Such large sites – especially those suited to both local and strategic needs – may well be required for the borough to do even that, given that this is likely beyond the existing supply of employment land which is set to diminish further in the coming years.*
- 1 *Any shortfall that does arise would likely also appear gradually, in the final decade of the new plan period, as Aspinall Verdi believe that only one of the three sites under iv consideration could be building out by 2030. It is also notable that the promoters of all three expect most newly created jobs to be filled by people living outside of Newcastle-under-Lyme, lessening reliance on the borough's resident labour force and thus reducing their impact on local housing need.*
- 1 *The Council is therefore not necessarily restricted from allocating a strategic site if it plans to provide 400 dwellings per annum, exceeding the minimum starting point set by the standard method as the NPPF explicitly allows when reflective of economic growth ambitions and infrastructure*



*investment. It would though be important to closely monitor the availability of labour in such a scenario, and evaluate the approach accordingly within the review of the Local Plan.*

**There is simply no justification for site AB2 in the light of the content of the Housing and Economic Needs Assessment report commissioned by the Council.** (Detail in Chapters 6 and 7.)

**It appears from the Summary – and the contents of the complete, detailed report – that there can be more than adequate existing and planned provision for additional employment development - without the development of the 80 hectares of site AB2.**

#### **The scale of the proposal and the use proposed is inappropriate**

The proposal is for a site area of 80 hectares (197 acres).

More background detail is given in the Aspinall Verdi report published by the Council in its evidence documents.

We welcome the publication of the document by the Council. The report sets out, in summary form, a range of issues. We would ask that the Inspector considers the matters raised in the report before deciding whether to recommend modifications to the plan, including the deletion of AB2 in its entirety (as we are seeking).

**In our representation we share the Concerns and Objections emboldened below.**

Extracts:

*Strategic Employment Sites Assessment – 2024 Update*

*June 2024*

*Private and Confidential*

Extracts:

*“2.3 The proposed strategic employment site is situated in Audley, close to M6 Junction 16. Audley, identified as a Rural Centre in the Local Plan, is located approximately four (4 miles to the northwest of Newcastle-under-Lyme). The rural centre is located between Newcastle-under-Lyme and Crewe, with the latter around an 8-mile journey away.*

*2.4 Later in the report, we provide details of the extensive requirements for this area from the Big Box market*

*2.6 This extends to about 78ha of land controlled by SMD and is capable of accommodating approximately 2.35 million sq. ft of employment accommodation, including multiple buildings in excess of 300,000 sq. ft, other buildings of at least 100,000 sq ft, and a largest building size well in excess of this, plus ancillary accommodation.*

*2.7 This is mainly targeted at the ‘Big Box’ market and would largely target the major space requirements that are current for this part of the M6 Corridor. The site is promoted by St Modwen Developments, who have previously engaged with the local authority. The developer has undertaken extensive due diligence on the weaknesses identified in earlier assessments of the site.*

*2.8 There are mitigation measures being developed for issues concerning the lack of public transport serving the site, access into the business park, local amenities and workforce accessibility.*

*2.11 The planned warehouses will be built to St Modwen Logistics’ ‘Swan Standard’ for sustainable construction, meaning they will be highly energy efficient and have an EPC ‘A’+ rating. This is equivalent to BREEAM excellent”*

*4.2 As would be expected for a site of this scale, there are mixed opinions on the AB2 site, with a range of concerns related to environmental, infrastructure and employment considerations. We set out a summary of the views in support and concerns and objections below.*

**Concerns and Objections**

*4.7 Concerns have been raised regarding the infrastructure and access implications of the AB2 site. This includes concerns regarding the widening of the A500 and its potential impact on Junction 16, as well as broader issues such as congestion, the destruction of hedgerows and a lack of sustainable transport options.*

*4.8 Cheshire East Council expresses reservations, citing concerns about A500 capacity, roundabout junctions, transport assessments and impacts on the M6 junction. They stress the need for a comprehensive evaluation of potential impacts on highways.*

*4.9 Environmental and biodiversity concerns have also been raised by consultees, encompassing potential impacts on heritage assets, conservation areas and the loss of Greenbelt Land, which is highlighted as an area of landscape enhancement. Furthermore, concerns about pollution, particularly from warehouses and associated traffic, have been expressed, along with concerns about potential losses of semiimproved grassland and wildlife habitats.*

*4.10 Sustainability and the need for evidence have emerged as prominent issues in the discussions. Stakeholders question the lack of evidence for exceptional circumstances, raise doubts about the sustainability appraisal of the project, and question the necessity of the proposed development in light of existing warehouses in the vicinity.*

*4.11 Employment and economic impact considerations are prevalent, with a call for higher quality, well-paid jobs and scepticism about the longevity of the proposed employment opportunities, given potential automation. Doubts also surround local job creation and economic benefits, specifically for Newcastle-under-Lyme.*

*4.12 Planning and policy considerations add another layer of complexity, with stakeholders questioning changes in land designation and expressing opposition to the development of greenfield areas. There are concerns about the loss of topsoil and the potential undermining of urban regeneration objectives through the development of greenfield land.*

*4.13 Public and amenity concerns are evident, including concerns about the impact on public footpaths and recreational areas and the potential dangers posed by emergency access routes with reduced visibility. Noise, light and other pollution affecting the local community are also cited as concerns.*

*4.14 Regional impacts are discussed, with debates about the site's contribution to Cheshire instead of Newcastle-under-Lyme. Ongoing discussions with National Highways regarding potential improvements to M6 Junction 16 add a regulatory and technical dimension to the discourse, with technical documents and considerations submitted by the applicant to support the development.*

#### **Highway Issues**

We recognise that there has been Highway Modelling carried on behalf of the council, but questions remain as to the way of achieving a satisfactory solution acceptable to the Highway Authority, Staffordshire County Council (re the A500) and Highways England (re the M6 and Junction 16).

We do not have evidence to demonstrate unsoundness. However, in the light of a recent planning appeal where permission was refused on appeal\* on highway grounds relating to a site allocated in a Local Plan, we would ask that the Inspector at the Examination is satisfied at this stage as to the soundness of the allocation on highway grounds.

\* Appeal Ref: APP/K0425/W/23/3332257

Land at Gomm Valley, Gomm Road, High Wycombe, Buckinghamshire HP10 8HB

#### **Other matters**

-  
We have looked at the Council's Evidence Base, which seems to be thorough and comprehensive. However, we have failed to find reference to the agricultural land grading of the site, a Landscape Impact Assessment for the area that includes the site, a Site Assessment Proforma, an Ecological Assessment or a Green Belt Assessment including the site. This information may have been published but we have not found it. We cannot therefore say, without evidence, that the allocation has not taken these issues into account is sound, but equally we cannot demonstrate that they have not been considered.

We hope that the Inspector will consider the available evidence put forward by the Council in relation to these matters and consider whether they are material to the question of the soundness of the plan or to the inclusion of site AB2.

**Matters of detail** – which may be considered relevant only if the Inspector does not recommend the deletion of the allocation.

- 13.18 *The height, scale and form of development should reflect the character of the area. Greenspace and landscape buffers should be used to break up the urban form and contribute to separation between areas. The height of buildings should avoid breaking treed skylines.*

This is unjustifiably vague. 'Treed skylines' are not identified. The location of greenspace and landscape buffers are not identified.

- As a minimum it is considered that maximum building heights and massing must be included in policy from the outset. This should be set out as a part of the proposal in the plan and be considered at the Examination. Buildings of this scale on the proposed allocation would have a massive and detrimental impact on the landscape involving significant earth movement to provide platforms for the very large buildings.
- Clarification is sought on just what is intended by the phrase "Appropriate building materials and colours should be used to screen visually intrusive development."
- 13.23 *Allocation of a site establishes the principle of a particular use. Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations. As such, the detail provided at the planning application stage may result in minor adjustments to the overall quantum of development achieved on the site.*

This is vague and unjustifiable. It is considered that it should at least define: a. the policy criteria referred to by cross referencing; b. what constitutes minor adjustments to the overall quantum of development. e.g. how is *minor* measured and just what is the *overall quantum* - the site area of 80 hectares or something else?

The proposal refers to safe and convenient access into the development (including for HGVs) via a new junction established from the A500 with emergency access via Barthomley Road, both to be delivered in Phase 1 of the development - but not explicitly including proposals for pedestrians, cyclists and other users who, potentially, would not be able to safely use the new junction.

No details of the proposed new junction are given e.g. only left in and out, a new traffic island, traffic lights, grade separated junction or something else. The proposed location in relation to the existing M6 junction and whether J16 requires modification is also unspecified.

It is suggested that this information should be required to be provided, together with the responses of the relevant highway authorities before the Examination in Public.

It appears that both the Highways Agency and East Cheshire Council have "concerns", but no detail is given of these – nor are the views of Staffordshire County Council referred to.

- *Implementation of an agreed comprehensive travel plan incorporating measures to support travel to / from the development, particularly by sustainable modes. This should implement initiatives to support sustainable travel into the site, to include cycle links into the development with suitable cycle parking / amenities, bus routes and demand responsive travel schemes to support workers travelling to / from the site. The Travel Plan should consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East.*

Unlike the requirements for access this is vague and not defined in terms of implementation e.g. to be agreed before first occupation by an employer and to be implemented within 3 months of the first occupation funded or subsidised by the developer and owners/occupiers.

If the Inspector does not recommend deleting the proposal it is requested that as a recommended modification the word 'should' ought to be replaced by a word such as 'must'. The preparation and implementation of the Travel Plan must be secured through a S.106 agreement,

- (3.13 *The allocation of the site would result in a loss of a layby by the A500. Consequently, secure and high-quality HGV parking should be provided as a replacement on the site. This should include an element of free short stay parking for all HGV vehicles.*)

	<p>The proposal refers to provision for secure, high-quality HGV lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. However, the policy shows no indication of location, scale or justification for the inclusion of parking - beyond replacement of the existing lay-by on the A500.</p> <ul style="list-style-type: none"> <li>It is unclear whether the Plan's requirements of Chapter 10, Infrastructure and Transport and Chapter 11, Sustainable Environment, can be met on the site.</li> <li>If Draft NPPF Paragraph 155 (or its equivalent) is included in a new NPPF it is requested that the Inspector should take this into account in the recommended modifications.</li> </ul>
<b>Q7 Modification</b>	<p>The proposal is considered to be wholly unjustified and unsound.</p> <p>The Inspector is asked to recommend a Main Modification to delete the site.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We would definitely wish to be invited as a participant in the hearing sessions in relation to this plan proposal to hear the discussion and to participate at the Inspector's invitation.
<b>Comment ID</b>	NULLP1025
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	CPRE Staffordshire
<b>Consultee Position</b>	Planning and Administrative Officer
<b>Consultee Family Name</b>	Burgess
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Policy HOU1 Development in the Green Belt and Affordable Housing</b></p> <p>In its recent consultation on the NPPF, the Government included the following:</p> <p><b>Golden rules to ensure public benefit</b></p> <ol style="list-style-type: none"> <li>The Government has committed to introducing 'golden rules' to ensure that major development on land released from the Green Belt benefits both communities and nature. This will build on our wider commitment for exemplary design, so that the following are required where land is released through plans or individual planning decisions:</li> <li>in the case of schemes involving the provision of housing, at least 50% affordable housing, with an appropriate proportion being Social Rent, subject to viability;</li> <li>necessary improvements to local or national infrastructure, including delivery of new schools, GP surgeries, transport links, care homes and nursery places, to deliver well-designed, connected places, recognising that local leaders are best placed to identify the infrastructure that their communities need; and</li> <li>the provision of new, or improvements to existing, local green spaces that are accessible to the public – where residential development is involved, new residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite facilities.</li> </ol> <p>24. The Government is proposing a target of 50% affordable housing on land released from the Green Belt for residential development. The Government is committed to delivering more genuinely affordable housing tenures, such as Social Rent. However, we also recognise that for the purposes of place-making, a balance of tenures is required. For that reason, we propose that the tenure split across affordable housing delivered under the golden rules should be for local authorities to decide.</p> <p>Whilst NuLBC could not have had sufficient time to re-consider the Regulation 19 documents before publication, it seems likely that by the time that the documents are sent to the Inspectorate, new policies will be in place, the plan will not conform with them and, if the document was not changed, it would be unsound.</p> <p>The Council may be prudent to consider whether it wishes to proceed to Examination and, if so, to ask the Inspector to recommend modifications to the Regulation 19 document to ensure that it meets Government policy and can be considered sound.</p>

	Our representation seeks modification of the council's policy to reflect new Government policy.
<b>Q7 Modification</b>	As a Main Modification, to amend existing policies or, preferably, to introduce an additional policy to specifically and solely refer to sites currently in the Green Belt to ensure that the Local Plan policy is clearly in accordance with national Government policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	If this is a subject for a hearing session, to take part in the discussion on how best to amend the plan to reflect published central Government policies.

<b>Comment ID</b>	NULLP1294
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Company / Organisation</b>	Talke Action Group
<b>Consultee Position</b>	Chairperson
<b>Consultee Family Name</b>	Butters
<b>Consultee Given Name</b>	C
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Foreword
<b>Q6 Details</b>	<p>[Admin Note, the following statement has been supported by a form of authority with approximately 172 signatures].</p> <p>Re: Newcastle-under-Lyme Borough Council ("the Council") Final Draft Local Plan 2020/2040 - Regulation 19 Consultation Please accept this letter as our representation in response to the above consultation, for onward submission to the Inspector.</p> <p><b>CONTENTS</b></p> <p>To assist you and the Inspector, the following is the order of our representation:</p> <ol style="list-style-type: none"> <li>1. Introductory comments.</li> <li>2. Personal details.</li> <li>3. Approach.</li> <li>4. Legally and procedurally compliant.</li> <li>5. Soundness (including each of the four heads, as set out in the National Planning Policy Framework).</li> <li>6. Suggested modifications.</li> <li>7. Conclusion.</li> </ol> <p><b>1. INTRODUCTORY COMMENTS</b></p> <p>We are the Talke Action Group ("TAG"), set up primarily to co-ordinate engagement with the Local Plan preparation process by the residents of the village of Talke/Talke Pits ("the Village"), part of the ward of Talke and Butt Lane in the borough of Newcastle-under-Lyme ("the Borough"). We are registered with the Council as a Consultee herein. In an effort to assist the Inspector, and as requested in the Planning Inspectorate's Guidance Note (Para 5.3 - "Where groups or individuals share a common view on the plan,...etc."), this letter of representation ("this letter") is respectfully submitted both on behalf of ourselves and also on behalf of all those individuals ("the signatories") who have signed the attached Forms of Authority, whereby they endorse this letter and the contents hereof as representing their joint and individual view. Accordingly, the term "our representation" as used herein reflects that this letter is the representation herein on behalf of both ourselves and the signatories, and the words "we" and "us" are similarly used.</p> <ul style="list-style-type: none"> <li>· In said attached Forms of Authority this letter is referred to as "the letter of representation".</li> <li>· Each of the signatories has so given said informed authority and endorsement following one-to-one drop-in engagement sessions during the Consultation period, between members of TAG and each signatory.</li> <li>· Our representation is submitted in letter form pursuant to advice that a letter is a proper and appropriate means of submission of Reg.19 representations, given by Councillor Fear, the Council's portfolio holder for Strategic Planning ("the Portfolio Holder").</li> </ul> <p><b>3. APPROACH</b></p> <ol style="list-style-type: none"> <li>a) In this letter, with regard to the concepts in parts 4 and 5 above, our representation follows the wording of para. 35 of the National Planning Policy Framework in force at this time.</li> <li>b) Pursuant to that wording, we do not consider that this Final Draft Local Plan ("the FDL Plan") has "been prepared in accordance with legal and procedural requirements" or that it is "sound". We are therefore raising objections to the FDL Plan under the pertinent heads.</li> <li>c) However, we are of the view that the Borough does need a Local plan, so that we do not wish to see the Plan struck down completely. Accordingly, where appropriate for each of the objections raised, this letter suggests relevant modifications.</li> <li>d) As we are residents of the Village, and are therefore largely not aware of detailed circumstance prevailing in other communities, most of our representations herein relate to the TK sites selected in the FDL Plan for development in the Village, namely sites TK6, TK10, TK17 and TK27 ("the TK sites"). However, because many of the reasons for which we consider the FDL Plan to be either not sound, or not legally/procedurally compliant, or both, relate to the FDL Plan as a whole insofar as they affect the TK sites, some representations are made regarding the FDL Plan as a whole but then show how they relate specifically to the Village and to the TK sites specifically. As in c) above, modifications are then suggested.</li> </ol> <p>Note: As the FDL Plan is a Council-derived document, we use the term "the Council" to refer also to the Council officers - elected and/or employed - engaged in guiding the FDL Plan through the process.</p> <p><b>NOT LEGALLY OR PROCEDURALLY COMPLIANT</b></p> <p>We do not believe the FDL Plan is legally/procedurally compliant.</p> <p><b>4.1 The consultation process</b></p> <p>Insofar as the residents of the Village are concerned, the consultation process has been drastically inadequate. Many, if not most of the residents, were until recently entirely unaware that a local plan was in the pipeline and equally unaware of the promulgation of the First Draft Local Plan or the FDL Plan. In our view, this inadequate consultation by the Council renders the FDL Plan non-compliant because :</p> <ol style="list-style-type: none"> <li>a) Community engagement</li> </ol>



(i) The Council may have given the appearance of complying, by sticking to minimum legal requirements regarding local plan community engagement, for example posting legal notices at the relevant sites and posting documents online. However, the Village population comprises a substantially larger than average percentage of older people, who do not or cannot engage with the internet. The Council will know this. Therefore, in accordance with its own Statement of Community Involvement (SCI), at para.1.13 (Equal Opportunity), the Council should have taken additional steps "in the way in which (they) consult ... to meet the specific local needs". This the Council has not done during the whole process.

(ii) This could - and indeed the SCI (at Table 2, p16) states that it will - be done by the distribution of "leaflets and posters". This does not appear to have been done for this local community with its "specific local need".

(iii) Having regard to this failure to consult in a way which meets specific local needs, there are other instances by which the Council has further failed in any meaningful way, insofar as the Village and its demographic is concerned, to comply with its own SCI, for example para 1.9, Community Involvement ("Inform people...and provide information...at the earliest opportunity"); para 1.15, Equal Opportunity (allowing the process to be "accessible to those who are unfamiliar with the terms, processes and structures of the planning system..."); para 2.1 ("Early and meaningful engagement...with...neighbourhoods...is essential"); and para 2.2 ("A range of methods and techniques will be used to involve communities...")

(iv) One clear item of evidence of the Council's failure to comply with its own SCI, and therefore to be legally compliant, relates to SCI para 1.14 (Equal Opportunity), which indicates that the Council will endeavour "to work in an inclusive manner" to deliver "planning services from the perspective of a range of potential users", including by "Organizing consultation events to maximise involvement...ie workshops." Yet, when holding such workshops was suggested at the relevant Scrutiny Committee meeting on 11.7.24, it was rejected out of hand using the spurious excuse that residents wouldn't be available!

(v) The Planning Inspectorate's own guidance/requirement document, in the part 3 "Legal Compliance" section, states clearly that "the process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement". To the extent that the FDL Plan, insofar as the Village is concerned and as evidenced in (i)-(iv) above, is not so in accordance, it is not legally compliant.

(vi) Lastly under this head we would like to point out that, although the Council loudly touts, as evidence of its engagement compliance, that it has allowed a consultation period which is longer than the minimum required (8 weeks instead of 6 weeks), it might as well be 1 week or 28 weeks - it makes no difference how long the consultation period is if ordinary residents have not been properly engaged with, taking into account not only the demographic of the Village per se but also the Council's obligations under their own SCI, both generally and given said demographic.

Conclusion: Because of the Council's failure, as above, to consult properly with the residents of the Village, given its specific demographic, the FDL Plan is not legally/procedurally compliant.

b) Consideration of consultation objections

It is self-evident, even to lay-persons such as we, that for a consultation to be meaningful and valid, the views, including any objections, of the consultees must be properly considered. If the consultation is treated by an LPA as merely a procedural formality, and the consultees' views arising thereout are not properly and fully considered, it is not a meaningful consultation, and the plan out of which the meaningless consultation arises cannot be legally compliant. We believe that this is the case with the FDL Plan, for the following reasons:

(i) In the Council's document in response to the Reg.18 consultation in respect of the First Draft of the Local Plan, where any proposed development site had had questions had been raised as to that site's suitability for development, the vast majority of the responses thereto was not a considered reply addressing any query, but merely a standard comment, the gist of which is that the site had been selected notwithstanding any objections raised nor addressing any such, and merely suggesting that any problems arising with any actual development could be dealt with when a planning application is made. The use of such an identical pro-forma response indicates clearly a lack of meaningful consideration of representations arising out of the consultation.

(ii) Further, those unconsidered responses not only evidence a lack of consideration of consultees' views, in itself rendering the consultation meaningless and the FDL Plan not legally compliant, but also fails to take into account circumstances where "planning" at the development stage will not solve the problem raised; or to offer any other solution. As examples, and with regard to the Village:

- what is the solution where there will be insufficient local school and/or health clinic places available as a consequence of development, but s106 funding would be of no use because there is no space in or around the existing facility for more staff to be employed or for an extension to be built?
- although construction of a roundabout might help with a substantially greater traffic flow at a dangerous junction, how will "planning" solve the problem of much greater traffic on the already dangerously congested main road through the village, which cannot be widened?
- How will planning considerations relating specifically and only to individual developments solve the larger problem of waste discharge in the locality? Viz: A report in 2023 covered the dumping of sewage into waterways by Severn Trent Water, revealing that during 2022 sewage was discharged into local waterways for 31,228 hours with 6,370 dumps in total. Alarming, the biggest polluter was the Liverpool Road works in Kidsgrove which discharged for 4,139 hours in 187 spills. This plant, which covers, inter alia, the Village as well as Butt Lane and Kidsgrove, clearly cannot cope with present demand. How will this plant cope with sewage from the hundreds of houses in the TK, BL and Kidsgrove sites? The Council appears not to have considered or addressed or informed consultees of how this will be dealt with. We stress that we are not asking the Inspector to examine these issues. We raise them as exemplars and evidence that the Council has either deliberately ignored or simply failed properly to consider and/or to address consultees' views.

(iii) This apparent failure properly and fully to consider the views of consultees, and consequently having nothing of substance to report back to them, both further represent yet another failure by the Council to comply with its own SCI, this time Para 1.9, the aim to "Respond to any comments received, giving proper consideration and explanations of how these views will be incorporated into the planning documents and decisions."

(iv) A disturbing sequence of documents seems to indicate that the relevant officers had decided, well in advance of any scrutiny or vote, that the FDL Plan should be recommended for approval to a full meeting of the Council. For example, way back in January 2024, a report by the Corporate Leadership Team to the Cabinet recommended that the Cabinet "(a)uthorises the Deputy Chief Executive, in consultation with the Strategic Planning Portfolio Holder, to recommend to Council at its meeting on 24 July that it approves the Final Draft Local Plan (at Regulation 19 stage)...for public consultation.." Please note that the Cabinet decided, on 16 January 2024, to recommend approval of the FDL Plan to the full Council meeting on 24 July 2024, over 6 months before that meeting, and indeed before the FDL Plan was promulgated and possibly even before it was prepared. (On 18 March 2024, the Corporate Leadership Team presented this decision by the Cabinet to the relevant Scrutiny Committee for their meeting on the same day, and they appear to have had no issue with it.) This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation, rendering the consultation extremely, if not fatally, flawed.

Conclusion: Because the representations arising out of the Regulation 18 consultation were not adequately considered, the consultation has not been properly and/or meaningfully conducted, and therefore the FDL Plan is not legally/procedurally compliant.

#### 4.2 Procedural Compliance

Although it again appears on the surface that the Council has carefully followed all the over-arching procedural steps required in this process, there have been at least two somewhat alarming occurrences evidencing that this has not actually been the case on closer examination.

##### a) Site Selection

(i) In the Local Plan Issues and Options Report in 2022, preparatory to preparation of the First Draft Local Plan, the long list of possible sites indicated that three of the TK sites (TK10, TK17 and TK27) were "unsuitable" for development. By the time of promulgation of the First Draft Local Plan, they had somehow become suitable, without any apparent explanation. The implications of this are somewhat disturbing, let alone it representing another failure of the Council for its evidence base to be transparent and available, and for residents to be kept informed, as in 4.1 above. However, the following point might shed some light on the mysterious elevation of these three sites.

(ii) At the meeting of the relevant Scrutiny Committee meeting on 11 July 2024, the Portfolio Holder was repeatedly asked how the final list of sites included in the First Draft of the Local Plan were selected from the longer list and whether Cabinet Members were involved. The Portfolio Holder repeatedly obfuscated and ultimately refused to answer. However, it subsequently appears that said selection was made by the Portfolio Holder and two other senior councillors from the same side of the chamber.

(iii) Given these occurrences, it is open to conjecture as to whether or not it is a coincidence that a by far greater proportion of sites selected for development are situated in wards represented by councillors from the party in opposition to that of the Portfolio Holder's majority governing party.

Conclusion: Although the initial stages of the site selection process appear to have been conducted openly and compliantly, there are questions around the final stages of the site selection, rendering the process certainly procedurally (and possibly also legally) non-compliant.

##### b) Document Availability

(i) The FDL Plan was approved for consultation and submission at a full meeting of the Council on 24 July 2024. However, issues relating to document availability cloud its approval.

(ii) For Councillors to have been able to make an informed decision when voting, over 40 documents forming the evidence base and informing the FDL Plan, were required to be examined and considered. However, a large number of these documents were not made available to Councillors sufficiently timeously for them to be able to examine same and render themselves fully informed. Eight such documents (almost 20% of the total) were only uploaded to the relevant website the previous afternoon, leaving Councillors in outside employment around 24 hours to read and examine hundreds of pages of formal documentation whilst working during the day. (A further 7 documents were uploaded to the web the day before that, making a total of 15 documents - over one-third of the total number - only made available 48 hours before the meeting.)

(iii) The opposition Councillors therefore proposed an amendment, that the decision to approve the FDL Plan be slightly delayed until the next Council meeting only two months later, to allow all Councillors fully to consider all the relevant documents. This was defeated, with speakers from the Portfolio Holder's majority party insisting that the plan be approved on that day. Disturbingly, a senior councillor from that party stated categorically that all but two of the documents were made available timeously. The promulgated list of dates and times of uploading of all the documents shows that this statement was - knowingly or unknowingly - untrue.

(iv) It is not clear whether the above events were deliberate or not - we hope not. Nonetheless, it is the case that documents vital to the integrity of the FDL Plan were not made appropriately, timeously or compliantly to many of those being asked to make a decision on the FDL Plan and this in itself renders the process not procedurally compliant. This is even more the case because the Council could have obviated the difficulty by delaying the decision, but pointedly and deliberately chose not to.

(v) Speaking to the amendment referred to above, one councillor remarked: "The expectation that we approve a local plan without these essential documents is not only unreasonable but also undermines the principles of sound governance. This is a formal process that requires thorough scrutiny and understanding of all supporting evidence. We must be fully informed to ensure that the plan we endorse is both sound and legally compliant." They were not, so the plan is not.

##### c) Cross Party Engagement

(i) The Council's SCI, at para 2.23, requires the Council, in preparing a local plan, "to ensure cross party engagement on the plan making process..". In taking the steps in 4a and 4b above, the Council has again failed to comply with its own SCI.

Conclusion: Consequent on the above, the FDL is neither procedurally nor legally compliant.

4.3 Sustainability Assessment Objectives, Strategic Objectives, and Transport and Accessibility Policy Development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with same.

(As details relating hereto are set out fully below, and as we would not wish the Inspector to have to read exactly the same content twice, we respectfully refer the Inspector to item 5.3,b ("Effective" head of "Soundness") below.)

Conclusion: Because of this, the FDL Plan, insofar as the TK sites are concerned, is not legally compliant.

## 5. SOUNDNESS

### 5.1 Positively prepared

No representations.

### 5.2 Justified

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is justified. This is for the following reasons:

#### a) Number of dwellings proposed for the TK sites

(i) The number of dwellings proposed to be built over the TK sites (over 300) is disproportionate for this small semi-rural village. It is not justifiable that the Village should bear the burden of 7% of the total Local Plan Housing Allocation of 4512 houses (para 5.5, FDL Plan), when neither its population nor its housing stock are anything like that percentage of the Borough as a whole. When looking at the figures for the Talke and Butt Lane ward as a whole, the figure of 520 dwellings proposed to be built (per FDL Plan, paras 13.194 - 13.231) in the ward represents 11.5% of the proposed development for the whole Borough. To impose this disproportionate burden on the village is not justified. (As to possible reasons for this high proportion of dwellings on the TK sites - all but 10 on greenbelt - being proposed to be imposed on the Village, we refer the Inspector back to point 4.2 above.)

Suggested Modification - Suggested Modification 1 below

#### b) The population of the Borough

The population of the Borough has only increased by 6.9% over the past four decades since 1981 (117,217 to 125,297, 1981-2022). The Council is allowing for an increase of 15% over the term. Even accepting that in matters of targets, some (but not all) issues are beyond the ambit of a Local authority, it is not justifiable that a greater proportion of what is already a possibly inflated target (ie above the national standard method calculation) should be borne by the Village. This is especially so when there are doubts about the motivation for and process of site selection, and there are brownfield sites (see c below) and empty homes (see 6.1,b,v below) available in the Borough which have not been selected.

Suggested Modification - Suggested Modification 1 below

#### c) Availability of brownfield sites

As indicated above (at point 4.2,a,i) the status of the Talke sites was changed from "unsuitable" to "suitable". At the same time, other sites (some brownfield) were changed from "suitable" to "unsuitable". These are however available and should be looked at again. For example, the unused and derelict Knutton Community Centre site was made available, but it appears that developers deemed the cost of eg decontamination to be too great and preferred untainted eg Green Belt land on which to build. The same is true of other available

brownfield sites in the Borough. It cannot be justified for Green Belt land to be sacrificed in order to increase

the profits of developers.

Suggested Modification - Suggested Modification 1 below

#### d) The effect on the nature of the Village

If all of the proposed 310 dwellings are built on the TK sites, and taking into account also development of sites such as the former TK5 site (see below at 6.1,b,iii) and any other windfall and/or buffer sites, this will represent an increase in the percentage of dwellings in the Village in the order of 20-30%! This volume of development is simply too great for Talke/Talke Pits. It would swamp the Village. It would irreparably and irreversibly change the nature of the Village from a semi-rural village to a sprawling dormitory town - although without the infrastructure to support it (see e below), rendering it with the worst of all worlds. To destroy the Village in this way by such a weight of development cannot be justified.

Suggested Modification - Suggested Modification 1 below.

#### e) Effect on local infrastructure

We appreciate that it is not within the ambit of this Regulation 19 Consultation for the Inspector to re-examine issues of local planning such as flooding or parking issues on the proposed development sites. However, where there are issues relating to off-site impacts, which have not been dealt with, either satisfactorily or at all, in the FDL Plan, then this goes to the Soundness of the FDL Plan under both heads of "Justified" and also "Effective" (as below).

The issue of the undealt-with problem of the knock-on effect of development of the TK sites on the Village as a whole, has been mentioned in passing at 4.1.b.ii above. It is not justifiable to propose a level of development on the Village which would exacerbate, and make critical, existing problems in a creaking and already inadequate infrastructure, without some level of pre-planning in the FDL Plan. Insofar as the Village is concerned, there appears to be none with regard to three major infrastructure problems which will arise should the TK site developments proceed, and which do not appear to be resolvable by specific planning arrangements for on-site or site-adjacent adaptations only. These are:

(i) As previously alluded to (4.1,b,ii), the volume of traffic (both local, and also that which uses the Village as

a rat-run to avoid congestion on the nearby arterial routes of the A34, the A500 and the M6) through and in the Village is already greatly excessive for the Village road network. The main road ("the main road") through the Village (comprising High Street, Crown Bank and Swan Bank, which all run seamlessly into each other to form one thoroughfare through the Village), is also already inadequate and at breaking point. The road, like Pit Lane, is narrow and often reduced to a point where two cars, let alone trucks, cannot pass. When not congested, vehicles speed through, and the road is dangerous for pedestrians and vehicles alike, as well as for ingress/egress from local residences. There would be no easy solution to this, even without further development, as the road cannot be widened.

The addition of hundreds more vehicles (anything between 310 and 620) on to the main road through, and other roads in, the Village cannot but seriously exacerbate an already critical situation, and render the local road network inoperable.

As above (4.1,b,ii - also Failure properly to consult) the FDL plan does not appear to make any provision for this, nor even to consider it. It cannot be justifiable to allocate development sites without appearing to have any great, or any, concern about, or to make provision for, the drastically adverse knock-on effect which such development would have on the Village and its residents.

Suggested Modifications - Suggested Modifications 1 (or 2) below.

(ii) Similar concerns relate to the local health clinic (Talke Clinic, part of the North Newcastle Primary Care Network, "the Clinic"). Although we understand that their list is not, at date hereof, entirely full, the clinic as it is would simply not be able to take in the residents of 310 dwellings. However, the logistics are that the current building is full, so that no further health staff can physically be accommodated; and the site will not allow for further expansion. Accordingly, the usual solution of s106 funding to employ further staff and/or to expand the building, is not available.

Yet the Council again appears not to have considered nor to make any specific proposals to solve this problem (unlike elsewhere, eg at the proposed Keele site, where a health Hub is mooted). The only solution therefore appears to be that patients will need to attend GPs further afield, either at other practices in the North Newcastle PCT, or even at practices in other, further away, PCTs.

The over-arching Staffordshire and Stoke-on-Trent Integrated Care Board ("ICB") is quite clear - for them, such list-dispersal, with patients having to travel distances to see a doctor, is a very last option, a last resort. The Council, however, seems, by failing to consider and actively to address the issue, in fact by default to be planning for the last resort in respect of the TK sites and the Village.

Inclusion of the TK sites in the FDL Plan cannot be justified where the health infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 3) below.

(iii) Again, there is a similar concern around local schooling, especially for children of primary school age. There is only one primary school in the Village, namely Springhead school ("the School"), to which the same problems (no unused internal space; no suitable site expansion room), again rendering s106 funding largely irrelevant. So, once again, primary school children will need to be found places further afield.

Inclusion of the TK sites in the FDL Plan cannot be justified where the school infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 4) below.

(iv) A further effect of (ii) and (iii) above, if patients and primary-age schoolchildren are listed or placed further afield, is additional car-journeys, and even worse exacerbation of the local road infrastructure problems, in (i) above. This cannot be justified.

(v) Lastly under e) hereof, although both the Staffs and Stoke ICB (regarding health issues) and the Staffordshire County Council (regarding education and other issues) have been consulted herein by the Council, it does not appear that the Council has actually approached or otherwise consulted directly with either the Clinic or the School, to ascertain from them the situation on the ground, so as to attempt to deal with it and/or to modify their site selection by eg removal of the TK sites from the FDL Plan, in light of these potentially insurmountable impact consequences. This cannot be justifiable.

f) Use of Green Belt land

Given all of the above - the disproportionate weight of development allocated for the TK sites, the questionable motivation for the site selection, the availability of brownfield sites and empty houses in the Borough, the fact that the Council would still meet its development target even without inclusion of the TK sites (see 6.1,b,i below), the detrimental effect that the proposed development on the TK sites would have on the Village, etc - it appears that there are no circumstances at all, let alone exceptional circumstances, which would necessitate or justify use of the Green Belt land proposed for the TK sites.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Justified".

### 5.3 Effective

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have thereon, is effective. This is for the following reasons:

a) Viability

Because of the intractable infrastructure difficulties outlined above (at 5.2,e), we do not believe the development on the TK sites is viable. If it is not viable, it cannot be effected, and is accordingly not effective. Suggested Modifications - Suggested Modification 1 (or 2 - 4) below.

b) Sustainability Assessment (SA) Objectives, Strategic Objectives, and Transport and Accessibility Policy (Policy IN2)

As 4.3 above (not legally and/or procedurally compliant), development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with them. Some examples are:

- SO IV - to "reduce the Borough's carbon footprint..." : the introduction of many more vehicles into a rural environment will have the opposite effect.
- SO VI - to "support the vitality of rural villages, preserving and enhancing the special character (of)...each local community" : development of the TK sites will destroy the cohesion and vitality of the Village, and its special character.
- SO VI - to "provide choice in housing types for local people." : local residents do not want a choice of large development-based housing which will have the adverse and destructive effects referred to herein.
- 1N2 1 b - development must allow for "integration with existing infrastructure." : as herein, development of the TK sites will overwhelm the existing road infrastructure to a point of collapse.
- IN2 1,e - development must "not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking..arrangements.." : as herein, this is exactly what development of the TK sites will cause
- IN2 1,f - Development must "not cause severe residual impacts on the road network, either direct and/or cumulative." : extremely severe such impacts on the local road network, both direct and cumulative is exactly what will happen if development of the TK sites goes ahead.



- SA Objective 1 - "To contribute to reduction of greenhouse gases.." : not to increase them in the locality by the introduction of many more vehicles into a rural environment.
- SA Objective 2 - "To improve air quality.." : by the introduction of many more vehicles into this rural environment?
- SA Objective 3 - "To protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity." : development of the TK sites, by diminishing and concreting over Green Belt land, will self-evidently destroy and reduce biodiversity; and Parrots Drumble, a small remnant of ancient Woodland and a nature reserve, with its delicate wildlife and biodiversity balance, is extremely close to site TK10.
- SA Objective 4 - "To..maintain..land resources" : losing the agricultural land within the TK sites does precisely the opposite.
- SA Objective 7 - "To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings" : aside of the loss of Village distinctiveness and heritage already cited, the last of local dry-stone walling and the Village's central Cross (original 12Century base are directly in the firing line of the increased traffic
- SA Objective 8 - "To strengthen the quality of the landscape.." : development of the Green Belt TK sites would, on the contrary, diminish and despoil not only the quality of the landscape per se, but also the visual and physical amenity it provides to the Village.
- SA Objective 9 - "To enhance the quality..and connectivity of open space.." : building over large parts of such Green Belt space self-evidently does exactly the opposite, reducing the quality and interrupting the connectivity of the of same.
- SA Objective 9 - "To improve the health and mental wellbeing of the population.." : increased traffic with greater pollution, the need for young children and patients to travel further afield to access school and health-care, a dangerous road environment, disintegration of an identifiable community, et al -how does this improve the health and welfare of the local population?

Accordingly, if the Council were to proceed with developing the TK sites, they would be in conflict with their own precepts. Not only does this render the FDL Plan not legally compliant (per 4.3 above), it also means that (unless the Council wishes deliberately to act in a non-legally-compliant manner), development of the TK sites cannot be affected as is. If such development cannot be affected then the FDL Plan, insofar as it relates to the TK sites, not effective.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Effective".

#### 5.4 Consistent with national policy

We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy,

for the following reasons :

- a) Transport - please see above re the local road system in the Village.
- b) Infrastructure - please see above re the Village infrastructure, namely school and health.
- c) Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites.
- d) Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.
- e) Health - please see above re pollution, degradation of environment, list dispersal, etc. Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan is not consistent with national policy, especially insofar as the TK sites are concerned, so that it is not Sound under this head.

## 6. SUGGESTED MODIFICATIONS

### 6.1 Suggested Modification 1

- a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that that the number of proposed dwellings for all or some of the Talke sites be reduced.
- b) This can be compensated for as follows:
  - (i) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.
  - (ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.
  - (iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.
  - (iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.
  - (v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.

The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).

Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.

**6.2 Suggested Modification 2**  
That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:

- a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.
- b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.
- c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.

It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.

**6.3 Suggested Modification 3**  
That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

**6.4 Suggested Modification 4**  
That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

**7. CONCLUSION**  
For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".  
Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.  
However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.  
We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.

**Q7 Modification**

**SUGGESTED MODIFICATIONS**

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**7. CONCLUSION**

For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".

Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.

However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.

We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.

<b>Comment ID</b>	NULLP1296
<b>Order</b>	220
<b>Title</b>	Policy TK6 Site at Coalpit Hill Talke
<b>Consultee Company / Organisation</b>	Talke Action Group
<b>Consultee Position</b>	Chairperson
<b>Consultee Family Name</b>	Butters
<b>Consultee Given Name</b>	C
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK6
<b>Q6 Details</b>	<p>[Admin Note, the following statement has been supported by a form of authority with appropriately 172 signatures].</p> <p>Re: Newcastle-under-Lyme Borough Council (" the Council") Final Draft Local Plan 2020/2040 - Regulation 19 Consultation Please accept this letter as our representation in response to the above consultation, for onward submission to the Inspector.</p> <p>CONTENTS</p> <p>To assist you and the Inspector, the following is the order of our representation:</p> <ol style="list-style-type: none"> <li>1. Introductory comments.</li> <li>2. Personal details.</li> <li>3. Approach.</li> <li>4. Legally and procedurally compliant.</li> <li>5. Soundness (including each of the four heads, as set out in the National Planning Policy Framework).</li> <li>6. Suggested modifications.</li> <li>7. Conclusion.</li> </ol>

## 1. INTRODUCTORY COMMENTS

We are the Talke Action Group ("TAG"), set up primarily to co-ordinate engagement with the Local Plan preparation process by the residents of the village of Talke/Talke Pits ("the Village"), part of the ward of Talke and Butt Lane in the borough of Newcastle-under-Lyme ("the Borough"). We are registered with the Council as a Consultee herein. In an effort to assist the Inspector, and as requested in the Planning Inspectorate's Guidance Note (Para 5.3 - "Where groups or individuals share a common view on the plan...etc."), this letter of representation ("this letter") is respectfully submitted both on behalf of ourselves and also on behalf of all those individuals ("the signatories") who have signed the attached Forms of Authority, whereby they endorse this letter and the contents hereof as representing their joint and individual view. Accordingly, the term "our representation" as used herein reflects that this letter is the representation herein on behalf of both ourselves and the signatories, and the words "we" and "us" are similarly used.

· In said attached Forms of Authority this letter is referred to as "the letter of representation".

· Each of the signatories has so given said informed authority and endorsement following one-to-one drop-in engagement sessions during the Consultation period, between members of TAG and each signatory.

· Our representation is submitted in letter form pursuant to advice that a letter is a proper and appropriate means of submission of Reg.19 representations, given by Councillor Fear, the Council's portfolio holder for Strategic Planning ("the Portfolio Holder").

## 3. APPROACH

a) In this letter, with regard to the concepts in parts 4 and 5 above, our representation follows the wording of para. 35 of the National Planning Policy Framework in force at this time.

b) Pursuant to that wording, we do not consider that this Final Draft Local Plan ("the FDL Plan") has "been prepared in accordance with legal and procedural requirements" or that it is "sound". We are therefore raising objections to the FDL Plan under the pertinent heads.

c) However, we are of the view that the Borough does need a Local plan, so that we do not wish to see the Plan struck down completely. Accordingly, where appropriate for each of the objections raised, this letter suggests relevant modifications.

d) As we are residents of the Village, and are therefore largely not aware of detailed circumstance prevailing in other communities, most of our representations herein relate to the TK sites selected in the FDL Plan for development in the Village, namely sites TK6, TK10, TK17 and TK27 ("the TK sites"). However, because many of the reasons for which we consider the FDL Plan to be either not sound, or not legally/procedurally compliant, or both, relate to the FDL Plan as a whole insofar as they affect the TK sites, some representations are made regarding the FDL Plan as a whole but then show how they relate specifically to the Village and to the TK sites specifically. As in c) above, modifications are then suggested.

Note: As the FDL Plan is a Council-derived document, we use the term "the Council" to refer also to the Council officers - elected and/or employed - engaged in guiding the FDL Plan through the process.

## NOT LEGALLY OR PROCEDURALLY COMPLIANT

We do not believe the FDL Plan is legally/procedurally compliant.

### 4.1 The consultation process

Insofar as the residents of the Village are concerned, the consultation process has been drastically inadequate. Many, if not most of the residents, were until recently entirely unaware that a local plan was in the pipeline and equally unaware of the promulgation of the First Draft Local Plan or the FDL Plan. In our view, this inadequate consultation by the Council renders the FDL Plan non-compliant because :

#### a) Community engagement

(i) The Council may have given the appearance of complying, by sticking to minimum legal requirements regarding local plan community engagement, for example posting legal notices at the relevant sites and posting documents online. However, the Village population comprises a substantially larger than average percentage of older people, who do not or cannot engage with the internet. The Council will know this. Therefore, in accordance with its own Statement of Community Involvement (SCI), at para.1.13 (Equal Opportunity), the Council should have taken additional steps "in the way in which (they) consult ... to meet the specific local needs". This the Council has not done during the whole process.

(ii) This could - and indeed the SCI (at Table 2, p16) states that it will - be done by the distribution of "leaflets and posters". This does not appear to have been done for this local community with its "specific local need".

(iii) Having regard to this failure to consult in a way which meets specific local needs, there are other instances by which the Council has further failed in any meaningful way, insofar as the Village and its demographic is concerned, to comply with its own SCI, for example para 1.9, Community Involvement ("Inform people...and provide information...at the earliest opportunity"); para 1.15, Equal Opportunity (allowing the process to be "accessible to those who are unfamiliar with the terms, processes and structures of the planning system..."); para 2.1 ("Early and meaningful engagement...with...neighbourhoods...is essential"); and para 2.2 ("A range of methods and techniques will be used to involve communities...")

(iv) One clear item of evidence of the Councils failure to comply with its own SCI, and therefore to be legally compliant, relates to SCI para 1.14 (Equal Opportunity), which indicates that the Council will endeavour "to work in an inclusive manner" to deliver "planning services from the perspective of a range of potential users", including by "Organizing consultation events to maximise involvement...ie workshops." Yet, when holding such workshops was suggested at the relevant Scrutiny Committee meeting on 11.7.24, it was rejected out of hand using the spurious excuse that residents wouldn't be available!

(v) The Planning Inspectorate's own guidance/requirement document, in the part 3 "Legal Compliance" section, states clearly that "the process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement". To the extent that the FDL Plan, insofar as the Village is concerned and as evidenced in (i)-(iv) above, is not so in accordance, it is not legally compliant.

(vi) Lastly under this head we would like to point out that, although the Council loudly touts, as evidence of its engagement compliance, that it has allowed a consultation period which is longer than the minimum required (8 weeks instead of 6 weeks), it might as well be 1 week or 28 weeks - it makes no difference

how long the consultation period is if ordinary residents have not been properly engaged with, taking into account not only the demographic of the Village per se but also the Council's obligations under their own SCI, both generally and given said demographic.

Conclusion: Because of the Council's failure, as above, to consult properly with the residents of the Village, given its specific demographic, the FDL Plan is not legally/procedurally compliant.

b) Consideration of consultation objections

It is self-evident, even to lay-persons such as we, that for a consultation to be meaningful and valid, the views, including any objections, of the consultees must be properly considered. If the consultation is treated by an LPA as merely a procedural formality, and the consultees' views arising thereout are not properly and fully considered, it is not a meaningful consultation, and the plan out of which the meaningless consultation arises cannot be legally compliant. We believe that this is the case with the FDL Plan, for the following reasons:

(i) In the Council's document in response to the Reg.18 consultation in respect of the First Draft of the Local Plan, where any proposed development site had had questions had been raised as to that site's suitability for development, the vast majority of the responses thereto was not a considered reply addressing any query, but merely a standard comment, the gist of which is that the site had been selected notwithstanding any objections raised nor addressing any such, and merely suggesting that any problems arising with any actual development could be dealt with when a planning application is made. The use of such an identical pro-forma response indicates clearly a lack of meaningful consideration of representations arising out of the consultation.

(ii) Further, those unconsidered responses not only evidence a lack of consideration of consultees' views, in itself rendering the consultation meaningless and the FDL Plan not legally compliant, but also fails to take into account circumstances where "planning" at the development stage will not solve the problem raised; or to offer any other solution. As examples, and with regard to the Village:

- what is the solution where there will be insufficient local school and/or health clinic places available as a consequence of development, but s106 funding would be of no use because there is no space in or around the existing facility for more staff to be employed or for an extension to be built?
- although construction of a roundabout might help with a substantially greater traffic flow at a dangerous junction, how will "planning" solve the problem of much greater traffic on the already dangerously congested main road through the village, which cannot be widened?
- How will planning considerations relating specifically and only to individual developments solve the larger problem of waste discharge in the locality? Viz: A report in 2023 covered the dumping of sewage into waterways by Severn Trent Water, revealing that during 2022 sewage was discharged into local waterways for 31,228 hours with 6,370 dumps in total. Alarming, the biggest polluter was the Liverpool Road works in Kidsgrove which discharged for 4,139 hours in 187 spills. This plant, which covers, inter alia, the Village as well as Butt Lane and Kidsgrove, clearly cannot cope with present demand. How will this plant cope with sewage from the hundreds of houses in the TK, BL and Kidsgrove sites? The Council appears not to have considered or addressed or informed consultees of how this will be dealt with. We stress that we are not asking the Inspector to examine these issues. We raise them as exemplars and evidence that the Council has either deliberately ignored or simply failed properly to consider and/or to address consultees' views.

(iii) This apparent failure properly and fully to consider the views of consultees, and consequently having nothing of substance to report back to them, both further represent yet another failure by the Council to comply with its own SCI, this time Para 1.9, the aim to "Respond to any comments received, giving proper consideration and explanations of how these views will be incorporated into the planning documents and decisions."

(iv) A disturbing sequence of documents seems to indicate that the relevant officers had decided, well in advance of any scrutiny or vote, that the FDL Plan should be recommended for approval to a full meeting of the Council. For example, way back in January 2024, a report by the Corporate Leadership Team to the Cabinet recommended that the Cabinet "(a)uthorises the Deputy Chief Executive, in consultation with the Strategic Planning Portfolio Holder, to recommend to Council at its meeting on 24 July that it approves the Final Draft Local Plan (at Regulation 19 stage)...for public consultation.." Please note that the Cabinet decided, on 16 January 2024, to recommend approval of the FDL Plan to the full Council meeting on 24 July 2024, over 6 months before that meeting, and indeed before the FDL Plan was promulgated and possibly even before it was prepared. (On 18 March 2024, the Corporate Leadership Team presented this decision by the Cabinet to the relevant Scrutiny Committee for their meeting on the same day, and they appear to have had no issue with it.) This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation, rendering the consultation extremely, if not fatally, flawed.

Conclusion: Because the representations arising out of the Regulation 18 consultation were not adequately considered, the consultation has not been properly and/or meaningfully conducted, and therefore the FDL Plan is not legally/procedurally compliant.

#### 4.2 Procedural Compliance

Although it again appears on the surface that the Council has carefully followed all the over-arching procedural steps required in this process, there have been at least two somewhat alarming occurrences evidencing that this has not actually been the case on closer examination.

a) Site Selection

(i) In the Local Plan Issues and Options Report in 2022, preparatory to preparation of the First Draft Local Plan, the long list of possible sites indicated that three of the TK sites (TK10, TK17 and TK27) were "unsuitable" for development. By the time of promulgation of the First Draft Local Plan, they had somehow become suitable, without any apparent explanation. The implications of this are somewhat disturbing, let alone it representing another failure of the Council for its evidence base to be transparent and available, and for residents to be kept informed, as in 4.1 above. However, the following point might shed some light on the mysterious elevation of these three sites.

(ii) At the meeting of the relevant Scrutiny Committee meeting on 11 July 2024, the Portfolio Holder was repeatedly asked how the final list of sites included in the First Draft of the Local Plan were selected from the longer list and whether Cabinet Members were involved. The Portfolio Holder repeatedly obfuscated

and ultimately refused to answer. However, it subsequently appears that said selection was made by the Portfolio Holder and two other senior councillors from the same side of the chamber.

(iii) Given these occurrences, it is open to conjecture as to whether or not it is a coincidence that a by far greater proportion of sites selected for development are situated in wards represented by councillors from the party in opposition to that of the Portfolio Holder's majority governing party.

Conclusion: Although the initial stages of the site selection process appear to have been conducted openly and compliantly, there are questions around the final stages of the site selection, rendering the process certainly procedurally (and possibly also legally) non-compliant.

#### b) Document Availability

(i) The FDL Plan was approved for consultation and submission at a full meeting of the Council on 24 July 2024. However, issues relating to document availability cloud its approval.

(ii) For Councillors to have been able to make an informed decision when voting, over 40 documents forming the evidence base and informing the FDL Plan, were required to be examined and considered. However, a large number of these documents were not made available to Councillors sufficiently timeously for them to be able to examine same and render themselves fully informed. Eight such documents (almost 20% of the total) were only uploaded to the relevant website the previous afternoon, leaving Councillors in outside employment around 24 hours to read and examine hundreds of pages of formal documentation whilst working during the day. (A further 7 documents were uploaded to the web the day before that, making a total of 15 documents - over one-third of the total number - only made available 48 hours before the meeting.)

(iii) The opposition Councillors therefore proposed an amendment, that the decision to approve the FDL Plan be slightly delayed until the next Council meeting only two months later, to allow all Councillors fully to consider all the relevant documents. This was defeated, with speakers from the Portfolio Holder's majority party insisting that the plan be approved on that day. Disturbingly, a senior councillor from that party stated categorically that all but two of the documents were made available timeously. The promulgated list of dates and times of uploading of all the documents shows that this statement was - knowingly or unknowingly - untrue.

(iv) It is not clear whether the above events were deliberate or not - we hope not. Nonetheless, it is the case that documents vital to the integrity of the FDL Plan were not made appropriately, timeously or compliantly to many of those being asked to make a decision on the FDL Plan and this in itself renders the process not procedurally compliant. This is even more the case because the Council could have obviated the difficulty by delaying the decision, but pointedly and deliberately chose not to.

(v) Speaking to the amendment referred to above, one councillor remarked: "The expectation that we approve a local plan without these essential documents is not only unreasonable but also undermines the principles of sound governance. This is a formal process that requires thorough scrutiny and understanding of all supporting evidence. We must be fully informed to ensure that the plan we endorse is both sound and legally compliant." They were not, so the plan is not.

#### c) Cross Party Engagement

(i) The Council's SCI, at para 2.23, requires the Council, in preparing a local plan, "to ensure cross party engagement on the plan making process..". In taking the steps in 4a and 4b above, the Council has again failed to comply with its own SCI.

Conclusion: Consequent on the above, the FDL is neither procedurally nor legally compliant.

4.3 Sustainability Assessment Objectives, Strategic Objectives, and Transport and Accessibility Policy Development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with same.

(As details relating hereto are set out fully below, and as we would not wish the Inspector to have to read exactly the same content twice, we respectfully refer the Inspector to item 5.3.b ("Effective" head of "Soundness") below.)

Conclusion: Because of this, the FDL Plan, insofar as the TK sites are concerned, is not legally compliant.

### 5. SOUNDNESS

#### 5.1 Positively prepared

No representations.

#### 5.2 Justified

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is justified. This is for the following reasons:

##### a) Number of dwellings proposed for the TK sites

(i) The number of dwellings proposed to be built over the TK sites (over 300) is disproportionate for this small semi-rural village. It is not justifiable that the Village should bear the burden of 7% of the total Local Plan Housing Allocation of 4512 houses (para 5.5, FDL Plan), when neither its population nor its housing stock are anything like that percentage of the Borough as a whole. When looking at the figures for the Talke and Butt Lane ward as a whole, the figure of 520 dwellings proposed to be built (per FDL Plan, paras 13.194 - 13.231) in the ward represents 11.5% of the proposed development for the whole Borough. To impose this disproportionate burden on the village is not justified. (As to possible reasons for this high proportion of dwellings on the TK sites - all but 10 on greenbelt - being proposed to be imposed on the Village, we refer the Inspector back to point 4.2 above.)

Suggested Modification - Suggested Modification 1 below

##### b) The population of the Borough

The population of the Borough has only increased by 6.9% over the past four decades since 1981 (117,217 to 125,297, 1981-2022). The Council is allowing for an increase of 15% over the term. Even accepting that in matters of targets, some (but not all) issues are beyond the ambit of a Local authority, it is not justifiable that a greater proportion of what is already a possibly inflated target (ie above the national standard method calculation) should be borne by the Village. This is especially so when there are doubts about the motivation for and process of site selection, and there are brownfield sites (see c below) and empty homes (see 6.1.b,v below) available in the Borough which have not been selected.

Suggested Modification - Suggested Modification 1 below

##### c) Availability of brownfield sites



As indicated above (at point 4.2,a,i) the status of the Talke sites was changed from "unsuitable" to "suitable". At the same time, other sites (some brownfield) were changed from "suitable" to "unsuitable". These are however available and should be looked at again. For example, the unused and derelict Knutton Community Centre site was made available, but it appears that developers deemed the cost of eg decontamination to be too great and preferred untainted eg Green Belt land on which to build. The same is true of other available brownfield sites in the Borough. It cannot be justified for Green Belt land to be sacrificed in order to increase

the profits of developers.

Suggested Modification - Suggested Modification 1 below

d) The effect on the nature of the Village

If all of the proposed 310 dwellings are built on the TK sites, and taking into account also development of sites such as the former TK5 site (see below at 6.1,b,iii) and any other windfall and/or buffer sites, this will represent an increase in the percentage of dwellings in the Village in the order of 20-30%! This volume of development is simply too great for Talke/Talke Pits. It would swamp the Village. It would irreparably and irreversibly change the nature of the Village from a semi-rural village to a sprawling dormitory town - although without the infrastructure to support it (see e below), rendering it with the worst of all worlds. To destroy the Village in this way by such a weight of development cannot be justified.

Suggested Modification - Suggested Modification 1 below.

e) Effect on local infrastructure

We appreciate that it is not within the ambit of this Regulation 19 Consultation for the Inspector to re-examine issues of local planning such as flooding or parking issues on the proposed development sites. However, where there are issues relating to off-site impacts, which have not been dealt with, either satisfactorily or at all, in the FDL Plan, then this goes to the Soundness of the FDL Plan under both heads of "Justified" and also "Effective" (as below).

The issue of the undealt-with problem of the knock-on effect of development of the TK sites on the Village as a whole, has been mentioned in passing at 4.1.b.ii above. It is not justifiable to propose a level of development on the Village which would exacerbate, and make critical, existing problems in a creaking and already inadequate infrastructure, without some level of pre-planning in the FDL Plan. Insofar as the Village is concerned, there appears to be none with regard to three major infrastructure problems which will arise should the TK site developments proceed, and which do not appear to be resolvable by specific planning arrangements for on-site or site-adjacent adaptations only. These are:

(i) As previously alluded to (4.1,b,ii), the volume of traffic (both local, and also that which uses the Village as

a rat-run to avoid congestion on the nearby arterial routes of the A34, the A500 and the M6) through and in the Village is already greatly excessive for the Village road network. The main road ("the main road") through the Village (comprising High Street, Crown Bank and Swan Bank, which all run seamlessly into each other to form one thoroughfare through the Village), is also already inadequate and at breaking point. The road, like Pit Lane, is narrow and often reduced to a point where two cars, let alone trucks, cannot pass. When not congested, vehicles speed through, and the road is dangerous for pedestrians and vehicles alike, as well as for ingress/egress from local residences. There would be no easy solution to this, even without further development, as the road cannot be widened.

The addition of hundreds more vehicles (anything between 310 and 620) on to the main road through, and other roads in, the Village cannot but seriously exacerbate an already critical situation, and render the local road network inoperable.

As above (4.1,b,ii - also Failure properly to consult) the FDL plan does not appear to make any provision for this, nor even to consider it. It cannot be justifiable to allocate development sites without appearing to have any great, or any, concern about, or to make provision for, the drastically adverse knock-on effect which such

development would have on the Village and its residents.

Suggested Modifications - Suggested Modifications 1 (or 2) below.

(ii) Similar concerns relate to the local health clinic (Talke Clinic, part of the North Newcastle Primary Care Network, "the Clinic"). Although we understand that their list is not, at date hereof, entirely full, the clinic as it is would simply not be able to take in the residents of 310 dwellings. However, the logistics are that the current building is full, so that no further health staff can physically be accommodated; and the site will not allow for further expansion. Accordingly, the usual solution of s106 funding to employ further staff and/or to expand the building, is not available.

Yet the Council again appears not to have considered nor to make any specific proposals to solve this problem (unlike elsewhere, eg at the proposed Keele site, where a health Hub is mooted). The only solution therefore appears to be that patients will need to attend GPs further afield, either at other practices in the North Newcastle PCT, or even at practices in other, further away, PCTs.

The over-arching Staffordshire and Stoke-on-Trent Integrated Care Board ("ICB") is quite clear - for them, such list-dispersal, with patients having to travel distances to see a doctor, is a very last option, a last resort. The Council, however, seems, by failing to consider and actively to address the issue, in fact by default to be planning for the last resort in respect of the TK sites and the Village.

Inclusion of the TK sites in the FDL Plan cannot be justified where the health infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 3) below.

(iii) Again, there is a similar concern around local schooling, especially for children of primary school age. There is only one primary school in the Village, namely Springhead school ("the School"), to which the same problems (no unused internal space; no suitable site expansion room), again rendering s106 funding largely irrelevant. So, once again, primary school children will need to be found places further afield.

Inclusion of the TK sites in the FDL Plan cannot be justified where the school infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 4) below.

(iv) A further effect of (ii) and (iii) above, if patients and primary-age schoolchildren are listed or placed further afield, is additional car-journeys, and even worse exacerbation of the local road infrastructure problems, in (i) above. This cannot be justified.

(v) Lastly under e) hereof, although both the Staffs and Stoke ICB (regarding health issues) and the Staffordshire County Council (regarding education and other issues) have been consulted herein by the Council, it does not appear that the Council has actually approached or otherwise consulted directly with either the Clinic or the School, to ascertain from them the situation on the ground, so as to attempt to deal with it and/or to modify their site selection by eg removal of the TK sites from the FDL Plan, in light of these potentially insurmountable impact consequences. This cannot be justifiable.

f) Use of Green Belt land

Given all of the above - the disproportionate weight of development allocated for the TK sites, the questionable motivation for the site selection, the availability of brownfield sites and empty houses in the Borough, the fact that the Council would still meet its development target even without inclusion of the TK sites (see 6.1,b,i below), the detrimental effect that the proposed development on the TK sites would have on the Village, etc - it appears that there are no circumstances at all, let alone exceptional circumstances, which would necessitate or justify use of the Green Belt land proposed for the TK sites.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Justified".

### 5.3 Effective

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have thereon, is effective. This is for the following reasons:

a) Viability

Because of the intractable infrastructure difficulties outlined above (at 5.2,e), we do not believe the development on the TK sites is viable. If it is not viable, it cannot be effected, and is accordingly not effective. Suggested Modifications - Suggested Modification 1 (or 2 - 4) below.

b) Sustainability Assessment (SA) Objectives, Strategic Objectives, and Transport and Accessibility Policy (Policy IN2)

As 4.3 above (not legally and/or procedurally compliant), development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with them. Some examples are:

- SO IV - to "reduce the Borough's carbon footprint..." : the introduction of many more vehicles into a rural environment will have the opposite effect.
- SO VI - to "support the vitality of rural villages, preserving and enhancing the special character (of)...each local community" : development of the TK sites will destroy the cohesion and vitality of the Village, and its special character.
- SO VI - to "provide choice in housing types for local people." : local residents do not want a choice of large development-based housing which will have the adverse and destructive effects referred to herein.
- 1N2 1 b - development must allow for "integration with existing infrastructure." : as herein, development of the TK sites will overwhelm the existing road infrastructure to a point of collapse.
- IN2 1,e - development must "not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking..arrangements.." : as herein, this is exactly what development of the TK sites will cause
- IN2 1,f - Development must "not cause severe residual impacts on the road network, either direct and/or cumulative." : extremely severe such impacts on the local road network, both direct and cumulative is exactly what will happen if development of the TK sites goes ahead.
- SA Objective 1 - "To contribute to reduction of greenhouse gases.." : not to increase them in the locality by the introduction of many more vehicles into a rural environment.
- SA Objective 2 - "To improve air quality.." : by the introduction of many more vehicles into this rural environment?
- SA Objective 3 - "To protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity." : development of the TK sites, by diminishing and concreting over Green Belt land, will self-evidently destroy and reduce biodiversity; and Parrots Drumble, a small remnant of ancient Woodland and a nature reserve, with its delicate wildlife and biodiversity balance, is extremely close to site TK10.
- SA Objective 4 - "To..maintain..land resources" : losing the agricultural land within the TK sites does precisely the opposite.
- SA Objective 7 - "To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings" : aside of the loss of Village distinctiveness and heritage already cited, the last of local dry-stone walling and the Village's central Cross (original 12Century base are directly in the firing line of the increased traffic
- SA Objective 8 - "To strengthen the quality of the landscape.." : development of the Green Belt TK sites would, on the contrary, diminish and despoil not only the quality of the landscape per se, but also the visual and physical amenity it provides to the Village.
- SA Objective 9 - "To enhance the quality..and connectivity of open space.." : building over large parts of such Green Belt space self-evidently does exactly the opposite, reducing the quality and interrupting the connectivity of the of same.
- SA Objective 9 - "To improve the health and mental wellbeing of the population.." : increased traffic with greater pollution, the need for young children and patients to travel further afield to access school and health-care, a dangerous road environment, disintegration of an identifiable community, et al -how does this improve the health and welfare of the local population?

Accordingly, if the Council were to proceed with developing the TK sites, they would be in conflict with their own precepts. Not only does this render the FDL Plan not legally compliant (per 4.3 above), it also means that (unless the Council wishes deliberately to act in a non-legally-compliant manner), development of the TK sites cannot be affected as is. If such development cannot be affected then the FDL Plan, insofar as it relates to the TK sites, not effective.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Effective".



#### 5.4 Consistent with national policy

We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy,

for the following reasons :

- a) Transport - please see above re the local road system in the Village.
- b) Infrastructure - please see above re the Village infrastructure, namely school and health.
- c) Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites.
- d) Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.
- e) Health - please see above re pollution, degradation of environment, list dispersal, etc. Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan is not consistent with national policy, especially insofar as the TK sites are concerned, so that it is not Sound under this head.

#### 6. SUGGESTED MODIFICATIONS

##### 6.1 Suggested Modification 1

- a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that the number of proposed dwellings for all or some of the Talke sites be reduced.

- b) This can be compensated for as follows:

(1) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas

the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.

(ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.

(iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.

(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.

(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.

The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).

Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.

##### 6.2 Suggested Modification 2

That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of

the TK sites, for example:

- a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.
- b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.
- c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.

It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.

##### 6.3 Suggested Modification 3

That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself,

as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

##### 6.4 Suggested Modification 4

That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

	<p><b>7. CONCLUSION</b></p> <p>For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".</p> <p>Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.</p> <p>However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.</p> <p>We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.</p>
<b>Q7 Modification</b>	<p><b>SUGGESTED MODIFICATIONS</b></p> <p><b>6.1 Suggested Modification 1</b></p> <p>a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that the number of proposed dwellings for all or some of the Talke sites be reduced.</p> <p>b) This can be compensated for as follows:</p> <p>(i) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.</p> <p>(ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.</p> <p>(iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.</p> <p>(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.</p> <p>(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.</p> <p>The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).</p> <p>Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.</p> <p><b>6.2 Suggested Modification 2</b></p> <p>That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:</p> <p>a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.</p> <p>b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.</p> <p>c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.</p> <p>It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.</p> <p><b>6.3 Suggested Modification 3</b></p> <p>That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself,</p> <p>as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>6.4 Suggested Modification 4</b></p>

	<p>That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p>7. CONCLUSION</p> <p>For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".</p> <p>Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.</p> <p>However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.</p> <p>We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.</p>
<b>Comment ID</b>	NULLP1298
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Company / Organisation</b>	Talke Action Group
<b>Consultee Position</b>	Chairperson
<b>Consultee Family Name</b>	Butters
<b>Consultee Given Name</b>	C
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17
<b>Q6 Details</b>	<p>[Admin Note, the following statement has been supported by a form of authority with appropriately 172 signatures].</p> <p>Re: Newcastle-under-Lyme Borough Council ("the Council") Final Draft Local Plan 2020/2040 - Regulation 19 Consultation Please accept this letter as our representation in response to the above consultation, for onward submission to the Inspector.</p> <p>CONTENTS</p> <p>To assist you and the Inspector, the following is the order of our representation:</p> <ol style="list-style-type: none"> <li>1. Introductory comments.</li> <li>2. Personal details.</li> <li>3. Approach.</li> <li>4. Legally and procedurally compliant.</li> <li>5. Soundness (including each of the four heads, as set out in the National Planning Policy Framework).</li> <li>6. Suggested modifications.</li> <li>7. Conclusion.</li> </ol> <p>1. INTRODUCTORY COMMENTS</p> <p>We are the Talke Action Group ("TAG"), set up primarily to co-ordinate engagement with the Local Plan preparation process by the residents of the village of Talke/Talke Pits ("the Village"), part of the ward of Talke and Butt Lane in the borough of Newcastle-under-Lyme ("the Borough"). We are registered with the Council as a Consultee herein. In an effort to assist the Inspector, and as requested in the Planning Inspectorate's Guidance Note (Para 5.3 - "Where groups or individuals share a common view on the plan,...etc."), this letter of representation ("this letter") is respectfully submitted both on behalf of ourselves and also on behalf of all those individuals ("the signatories") who have signed the attached Forms of Authority, whereby they endorse this letter and the contents hereof as representing their joint and individual view. Accordingly, the term "our representation" as used herein reflects that this letter is the representation herein on behalf of both ourselves and the signatories, and the words "we" and "us" are similarly used.</p> <ul style="list-style-type: none"> <li>· In said attached Forms of Authority this letter is referred to as "the letter of representation".</li> <li>· Each of the signatories has so given said informed authority and endorsement following one-to-one drop-in engagement sessions during the Consultation period, between members of TAG and each signatory.</li> <li>· Our representation is submitted in letter form pursuant to advice that a letter is a proper and appropriate means of submission of Reg.19 representations, given by Councillor Fear, the Council's portfolio holder for Strategic Planning ("the Portfolio Holder").</li> </ul> <p>3. APPROACH</p> <ol style="list-style-type: none"> <li>a) In this letter, with regard to the concepts in parts 4 and 5 above, our representation follows the wording of para. 35 of the National Planning Policy Framework in force at this time.</li> <li>b) Pursuant to that wording, we do not consider that this Final Draft Local Plan ("the FDL Plan") has "been prepared in accordance with legal and procedural requirements" or that it is "sound". We are therefore raising objections to the FDL Plan under the pertinent heads.</li> <li>c) However, we are of the view that the Borough does need a Local plan, so that we do not wish to see the Plan struck down completely. Accordingly, where appropriate for each of the objections raised, this letter suggests relevant modifications.</li> <li>d) As we are residents of the Village, and are therefore largely not aware of detailed circumstance prevailing in other communities, most of our representations herein relate to the TK sites selected in the FDL Plan for development in the Village, namely sites TK6, TK10, TK17 and TK27 ("the TK sites").</li> </ol>

However, because many of the reasons for which we consider the FDL Plan to be either not sound, or not legally/procedurally compliant, or both, relate to the FDL Plan as a whole insofar as they affect the TK sites, some representations are made regarding the FDL Plan as a whole but then show how they relate specifically to the Village and to the TK sites specifically. As in c) above, modifications are then suggested.

Note: As the FDL Plan is a Council-derived document, we use the term "the Council" to refer also to the Council officers - elected and/or employed - engaged in guiding the FDL Plan through the process.

#### NOT LEGALLY OR PROCEDURALLY COMPLIANT

We do not believe the FDL Plan is legally/procedurally compliant.

##### 4.1 The consultation process

Insofar as the residents of the Village are concerned, the consultation process has been drastically inadequate. Many, if not most of the residents, were until recently entirely unaware that a local plan was in the pipeline and equally unaware of the promulgation of the First Draft Local Plan or the FDL Plan. In our view, this inadequate consultation by the Council renders the FDL Plan non-compliant because :

##### a) Community engagement

(i) The Council may have given the appearance of complying, by sticking to minimum legal requirements regarding local plan community engagement, for example posting legal notices at the relevant sites and posting documents online. However, the Village population comprises a substantially larger than average percentage of older people, who do not or cannot engage with the internet. The Council will know this. Therefore, in accordance with its own Statement of Community Involvement (SCI), at para.1.13 (Equal Opportunity"), the Council should have taken additional steps "in the way in which (they) consult ... to meet the specific local needs". This the Council has not done during the whole process.

(ii) This could - and indeed the SCI (at Table 2, p16) states that it will - be done by the distribution of "leaflets and posters". This does not appear to have been done for this local community with its "specific local need".

(iii) Having regard to this failure to consult in a way which meets specific local needs, there are other instances by which the Council has further failed in any meaningful way, insofar as the Village and its demographic is concerned, to comply with its own SCI, for example para 1.9, Community Involvement ("Inform people...and provide information...at the earliest opportunity"); para1.15, Equal Opportunity (allowing the process to be "accessible to those who are unfamiliar with the terms, processes and structures of the planning system..."); para 2.1 ("Early and meaningful engagement...with...neighbourhoods...is essential"); and para 2.2 ("A range of methods and techniques will be used to involve communities...")

(iv) One clear item of evidence of the Councils failure to comply with its own SCI, and therefore to be legally compliant, relates to SCI para 1.14 (Equal Opportunity), which indicates that the Council will endeavour "to work in an inclusive manner" to deliver "planning services from the perspective of a range of potential users", including by "Organizing consultation events to maximise involvement..ie workshops." Yet, when holding such workshops was suggested at the relevant Scrutiny Committee meeting on 11.7.24, it was rejected out of hand using the spurious excuse that residents wouldn't be available!

(v) The Planning Inspectorate's own guidance/requirement document, in the part 3 "Legal Compliance" section, states clearly that "the process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement". To the extent that the FDL Plan, insofar as the Village is concerned and as evidenced in (i)-(iv) above, is not so in accordance, it is not legally compliant.

(vi) Lastly under this head we would like to point out that, although the Council loudly touts, as evidence of its engagement compliance, that it has allowed a consultation period which is longer than the minimum required (8 weeks instead of 6 weeks), it might as well be 1 week or 28 weeks - it makes no difference how long the consultation period is if ordinary residents have not been properly engaged with, taking into account not only the demographic of the Village per se but also the Council's obligations under their own SCI, both generally and given said demographic.

Conclusion: Because of the Council's failure, as above, to consult properly with the residents of the Village, given its specific demographic, the FDL Plan is not legally/procedurally compliant.

##### b) Consideration of consultation objections

It is self-evident, even to lay-persons such as we, that for a consultation to be meaningful and valid, the views, including any objections, of the consultees must be properly considered. If the consultation is treated by an LPA as merely a procedural formality, and the consultees' views arising thereout are not properly and fully considered, it is not a meaningful consultation, and the plan out of which the meaningless consultation arises cannot be legally compliant. We believe that this is the case with the FDL Plan, for the following reasons:

(i) In the Council's document in response to the Reg.18 consultation in respect of the First Draft of the Local Plan, where any proposed development site had had questions had been raised as to that site's suitability for development, the vast majority of the responses thereto was not a considered reply addressing any query, but merely a standard comment, the gist of which is that the site had been selected notwithstanding any objections raised nor addressing any such, and merely suggesting that any problems arising with any actual development could be dealt with when a planning application is made. The use of such an identical pro-forma response indicates clearly a lack of meaningful consideration of representations arising out of the consultation.

(ii) Further, those unconsidered responses not only evidence a lack of consideration of consultees' views, in itself rendering the consultation meaningless and the FDL Plan not legally compliant, but also fails to take into account circumstances where "planning" at the development stage will not solve the problem raised; or to offer any other solution. As examples, and with regard to the Village:

- what is the solution where there will be insufficient local school and/or health clinic places available as a consequence of development, but s106 funding would be of no use because there is no space in or around the existing facility for more staff to be employed or for an extension to be built?
- although construction of a roundabout might help with a substantially greater traffic flow at a dangerous junction, how will "planning" solve the problem of much greater traffic on the already dangerously congested main road through the village, which cannot be widened?



· How will planning considerations relating specifically and only to individual developments solve the larger problem of waste discharge in the locality? Viz: A report in 2023 covered the dumping of sewage into waterways by Severn Trent Water, revealing that during 2022 sewage was discharged into local waterways for 31,228 hours with 6,370 dumps in total. Alarming, the biggest polluter was the Liverpool Road works in Kidsgrove which discharged for 4,139 hours in 187 spills. This plant, which covers, inter alia, the Village as well as Butt Lane and Kidsgrove, clearly cannot cope with present demand. How will this plant cope with sewage from the hundreds of houses in the TK, BL and Kidsgrove sites? The Council appears not to have considered or addressed or informed consultees of how this will be dealt with. We stress that we are not asking the Inspector to examine these issues. We raise them as exemplars and evidence that the Council has either deliberately ignored or simply failed properly to consider and/or to address consultees' views.

(iii) This apparent failure properly and fully to consider the views of consultees, and consequently having nothing of substance to report back to them, both further represent yet another failure by the Council to comply with its own SCI, this time Para 1.9, the aim to "Respond to any comments received, giving proper consideration and explanations of how these views will be incorporated into the planning documents and decisions."

(iv) A disturbing sequence of documents seems to indicate that the relevant officers had decided, well in advance of any scrutiny or vote, that the FDL Plan should be recommended for approval to a full meeting of the Council. For example, way back in January 2024, a report by the Corporate Leadership Team to the Cabinet recommended that the Cabinet "(a)uthorises the Deputy Chief Executive, in consultation with the Strategic Planning Portfolio Holder, to recommend to Council at its meeting on 24 July that it approves the Final Draft Local Plan (at Regulation 19 stage)...for public consultation.." Please note that the Cabinet decided, on 16 January 2024, to recommend approval of the FDL Plan to the full Council meeting on 24 July 2024, over 6 months before that meeting, and indeed before the FDL Plan was promulgated and possibly even before it was prepared. (On 18 March 2024, the Corporate Leadership Team presented this decision by the Cabinet to the relevant Scrutiny Committee for their meeting on the same day, and they appear to have had no issue with it.) This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation, rendering the consultation extremely, if not fatally, flawed.

Conclusion: Because the representations arising out of the Regulation 18 consultation were not adequately considered, the consultation has not been properly and/or meaningfully conducted, and therefore the FDL Plan is not legally/procedurally compliant.

#### 4.2 Procedural Compliance

Although it again appears on the surface that the Council has carefully followed all the over-arching procedural steps required in this process, there have been at least two somewhat alarming occurrences evidencing that this has not actually been the case on closer examination.

##### a) Site Selection

(i) In the Local Plan Issues and Options Report in 2022, preparatory to preparation of the First Draft Local Plan, the long list of possible sites indicated that three of the TK sites (TK10, TK17 and TK27) were "unsuitable" for development. By the time of promulgation of the First Draft Local Plan, they had somehow become suitable, without any apparent explanation. The implications of this are somewhat disturbing, let alone it representing another failure of the Council for its evidence base to be transparent and available, and for residents to be kept informed, as in 4.1 above. However, the following point might shed some light on the mysterious elevation of these three sites.

(ii) At the meeting of the relevant Scrutiny Committee meeting on 11 July 2024, the Portfolio Holder was repeatedly asked how the final list of sites included in the First Draft of the Local Plan were selected from the longer list and whether Cabinet Members were involved. The Portfolio Holder repeatedly obfuscated and ultimately refused to answer. However, it subsequently appears that said selection was made by the Portfolio Holder and two other senior councillors from the same side of the chamber.

(iii) Given these occurrences, it is open to conjecture as to whether or not it is a coincidence that a by far greater proportion of sites selected for development are situated in wards represented by councillors from the party in opposition to that of the Portfolio Holder's majority governing party.

Conclusion: Although the initial stages of the site selection process appear to have been conducted openly and compliantly, there are questions around the final stages of the site selection, rendering the process certainly procedurally (and possibly also legally) non-compliant.

##### b) Document Availability

(i) The FDL Plan was approved for consultation and submission at a full meeting of the Council on 24 July 2024. However, issues relating to document availability cloud its approval.

(ii) For Councillors to have been able to make an informed decision when voting, over 40 documents forming the evidence base and informing the FDL Plan, were required to be examined and considered. However, a large number of these documents were not made available to Councillors sufficiently timeously for them to be able to examine same and render themselves fully informed. Eight such documents (almost 20% of the total) were only uploaded to the relevant website the previous afternoon, leaving Councillors in outside employment around 24 hours to read and examine hundreds of pages of formal documentation whilst working during the day. (A further 7 documents were uploaded to the web the day before that, making a total of 15 documents - over one-third of the total number - only made available 48 hours before the meeting.)

(iii) The opposition Councillors therefore proposed an amendment, that the decision to approve the FDL Plan be slightly delayed until the next Council meeting only two months later, to allow all Councillors fully to consider all the relevant documents. This was defeated, with speakers from the Portfolio Holder's majority party insisting that the plan be approved on that day. Disturbingly, a senior councillor from that party stated categorically that all but two of the documents were made available timeously. The promulgated list of dates and times of uploading of all the documents shows that this statement was - knowingly or unknowingly - untrue.

(iv) It is not clear whether the above events were deliberate or not - we hope not. Nonetheless, it is the case that documents vital to the integrity of the FDL Plan were not made appropriately, timeously or compliantly to many of those being asked to make a decision on the FDL Plan and this in itself renders

the process not procedurally compliant. This is even more the case because the Council could have obviated the difficulty by delaying the decision, but pointedly and deliberately chose not to.

(v) Speaking to the amendment referred to above, one councillor remarked: "The expectation that we approve a local plan without these essential documents is not only unreasonable but also undermines the principles of sound governance. This is a formal process that requires thorough scrutiny and understanding of all supporting evidence. We must be fully informed to ensure that the plan we endorse is both sound and legally compliant." They were not, so the plan is not.

c) Cross Party Engagement

(i) The Council's SCI, at para 2.23, requires the Council, in preparing a local plan, "to ensure cross party engagement on the plan making process..". In taking the steps in 4a and 4b above, the Council has again failed to comply with its own SCI.

Conclusion: Consequent on the above, the FDL is neither procedurally nor legally compliant.

4.3 Sustainability Assessment Objectives, Strategic Objectives, and Transport and Accessibility Policy Development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with same. (As details relating hereto are set out fully below, and as we would not wish the Inspector to have to read exactly the same content twice, we respectfully refer the Inspector to item 5.3,b ("Effective" head of "Soundness") below.)

Conclusion: Because of this, the FDL Plan, insofar as the TK sites are concerned, is not legally compliant.

5. SOUNDNESS

5.1 Positively prepared

No representations.

5.2 Justified

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have thereon, is justified. This is for the following reasons:

a) Number of dwellings proposed for the TK sites

(i) The number of dwellings proposed to be built over the TK sites (over 300) is disproportionate for this small semi-rural village. It is not justifiable that the Village should bear the burden of 7% of the total Local Plan Housing Allocation of 4512 houses (para 5.5, FDL Plan), when neither its population nor its housing stock are anything like that percentage of the Borough as a whole. When looking at the figures for the Talke and Butt Lane ward as a whole, the figure of 520 dwellings proposed to be built (per FDL Plan, paras 13.194 - 13.231) in the ward represents 11.5% of the proposed development for the whole Borough. To impose this disproportionate burden on the village is not justified. (As to possible reasons for this high proportion of dwellings on the TK sites - all but 10 on greenbelt - being proposed to be imposed on the Village, we refer the Inspector back to point 4.2 above.)

Suggested Modification - Suggested Modification 1 below

b) The population of the Borough

The population of the Borough has only increased by 6.9% over the past four decades since 1981 (117,217 to 125,297, 1981-2022). The Council is allowing for an increase of 15% over the term. Even accepting that in matters of targets, some (but not all) issues are beyond the ambit of a Local authority, it is not justifiable that a greater proportion of what is already a possibly inflated target (ie above the national standard method calculation) should be borne by the Village. This is especially so when there are doubts about the motivation for and process of site selection, and there are brownfield sites (see c below) and empty homes (see 6.1,b,v below) available in the Borough which have not been selected.

Suggested Modification - Suggested Modification 1 below

c) Availability of brownfield sites

As indicated above (at point 4.2,a,i) the status of the Talke sites was changed from "unsuitable" to "suitable". At the same time, other sites (some brownfield) were changed from "suitable" to "unsuitable". These are however available and should be looked at again. For example, the unused and derelict Knutton Community Centre site was made available, but it appears that developers deemed the cost of eg decontamination to be too great and preferred untainted eg Green Belt land on which to build. The same is true of other available brownfield sites in the Borough. It cannot be justified for Green Belt land to be sacrificed in order to increase the profits of developers.

Suggested Modification - Suggested Modification 1 below

d) The effect on the nature of the Village

If all of the proposed 310 dwellings are built on the TK sites, and taking into account also development of sites such as the former TK5 site (see below at 6.1,b,iii) and any other windfall and/or buffer sites, this will represent an increase in the percentage of dwellings in the Village in the order of 20-30%! This volume of development is simply too great for Talke/Talke Pits. It would swamp the Village. It would irreparably and irreversibly change the nature of the Village from a semi-rural village to a sprawling dormitory town - although without the infrastructure to support it (see e below), rendering it with the worst of all worlds. To destroy the Village in this way by such a weight of development cannot be justified.

Suggested Modification - Suggested Modification 1 below.

e) Effect on local infrastructure

We appreciate that it is not within the ambit of this Regulation 19 Consultation for the Inspector to re-examine issues of local planning such as flooding or parking issues on the proposed development sites. However, where there are issues relating to off-site impacts, which have not been dealt with, either satisfactorily or at all, in the FDL Plan, then this goes to the Soundness of the FDL Plan under both heads of "Justified" and also "Effective" (as below).

The issue of the undealt-with problem of the knock-on effect of development of the TK sites on the Village as a whole, has been mentioned in passing at 4.1.b.ii above. It is not justifiable to propose a level of development on the Village which would exacerbate, and make critical, existing problems in a creaking and already inadequate infrastructure, without some level of pre-planning in the FDL Plan. Insofar as the Village is concerned, there appears to be none with regard to three major infrastructure problems



which will arise should the TK site developments proceed, and which do not appear to be resolvable by specific planning arrangements for on-site or site-adjacent adaptations only. These are:

(i) As previously alluded to (4.1,b,ii), the volume of traffic (both local, and also that which uses the Village as

a rat-run to avoid congestion on the nearby arterial routes of the A34, the A500 and the M6) through and in the Village is already greatly excessive for the Village road network. The main road ("the main road") through the Village (comprising High Street, Crown Bank and Swan Bank, which all run seamlessly into each other to form one thoroughfare through the Village), is also already inadequate and at breaking point. The road, like Pit Lane, is narrow and often reduced to a point where two cars, let alone trucks, cannot pass. When not congested, vehicles speed through, and the road is dangerous for pedestrians and vehicles alike, as well as for ingress/egress from local residences. There would be no easy solution to this, even without further development, as the road cannot be widened.

The addition of hundreds more vehicles (anything between 310 and 620) on to the main road through, and other roads in, the Village cannot but seriously exacerbate an already critical situation, and render the local road network inoperable.

As above (4.1,b,ii - also Failure properly to consult) the FDL plan does not appear to make any provision for this, nor even to consider it. It cannot be justifiable to allocate development sites without appearing to have any great, or any, concern about, or to make provision for, the drastically adverse knock-on effect which such

development would have on the Village and its residents.

Suggested Modifications - Suggested Modifications 1 (or 2) below.

(ii) Similar concerns relate to the local health clinic (Talke Clinic, part of the North Newcastle Primary Care Network, "the Clinic"). Although we understand that their list is not, at date hereof, entirely full, the clinic as it is would simply not be able to take in the residents of 310 dwellings. However, the logistics are that the current building is full, so that no further health staff can physically be accommodated; and the site will not allow for further expansion. Accordingly, the usual solution of s106 funding to employ further staff and/or to expand the building, is not available.

Yet the Council again appears not to have considered nor to make any specific proposals to solve this problem (unlike elsewhere, eg at the proposed Keele site, where a health Hub is mooted). The only solution therefore appears to be that patients will need to attend GPs further afield, either at other practices in the North Newcastle PCT, or even at practices in other, further away, PCTs.

The over-arching Staffordshire and Stoke-on-Trent Integrated Care Board ("ICB") is quite clear - for them, such list-dispersal, with patients having to travel distances to see a doctor, is a very last option, a last resort. The Council, however, seems, by failing to consider and actively to address the issue, in fact by default to be planning for the last resort in respect of the TK sites and the Village.

Inclusion of the TK sites in the FDL Plan cannot be justified where the health infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 3) below.

(iii) Again, there is a similar concern around local schooling, especially for children of primary school age. There is only one primary school in the Village, namely Springhead school ("the School"), to which the same problems (no unused internal space; no suitable site expansion room), again rendering s106 funding largely irrelevant. So, once again, primary school children will need to be found places further afield.

Inclusion of the TK sites in the FDL Plan cannot be justified where the school infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 4) below.

(iv) A further effect of (ii) and (iii) above, if patients and primary-age schoolchildren are listed or placed further afield, is additional car-journeys, and even worse exacerbation of the local road infrastructure problems, in (i) above. This cannot be justified.

(v) Lastly under e) hereof, although both the Staffs and Stoke ICB (regarding health issues) and the Staffordshire County Council (regarding education and other issues) have been consulted herein by the Council, it does not appear that the Council has actually approached or otherwise consulted directly with either the Clinic or the School, to ascertain from them the situation on the ground, so as to attempt to deal with it and/or to modify their site selection by eg removal of the TK sites from the FDL Plan, in light of these potentially insurmountable impact consequences. This cannot be justifiable.

f) Use of Green Belt land

Given all of the above - the disproportionate weight of development allocated for the TK sites, the questionable motivation for the site selection, the availability of brownfield sites and empty houses in the Borough, the fact that the Council would still meet its development target even without inclusion of the TK sites (see 6.1,b,i below), the detrimental effect that the proposed development on the TK sites would have on the Village, etc - it appears that there are no circumstances at all, let alone exceptional circumstances, which would necessitate or justify use of the Green Belt land proposed for the TK sites.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Justified".

### 5.3 Effective

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is effective. This is for the following reasons:

#### a) Viability

Because of the intractable infrastructure difficulties outlined above (at 5.2,e), we do not believe the development on the TK sites is viable. If it is not viable, it cannot be effected, and is accordingly not effective. Suggested Modifications - Suggested Modification 1 (or 2 - 4) below.

#### b) Sustainability Assessment (SA) Objectives, Strategic Objectives, and Transport and Accessibility Policy (Policy IN2)

As 4.3 above (not legally and/or procedurally compliant), development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with them. Some examples are:

- SO IV - to "reduce the Borough's carbon footprint..." : the introduction of many more vehicles into a rural environment will have the opposite effect.
- SO VI - to "support the vitality of rural villages, preserving and enhancing the special character (of)...each local community" : development of the TK sites will destroy the cohesion and vitality of the Village, and its special character.
- SO VI - to "provide choice in housing types for local people." : local residents do not want a choice of large development-based housing which will have the adverse and destructive effects referred to herein.
- 1N2 1 b - development must allow for "integration with existing infrastructure." : as herein, development of the TK sites will overwhelm the existing road infrastructure to a point of collapse.
- IN2 1,e - development must "not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking..arrangements.." : as herein, this is exactly what development of the TK sites will cause
- IN2 1,f - Development must "not cause severe residual impacts on the road network, either direct and/or cumulative." : extremely severe such impacts on the local road network, both direct and cumulative is exactly what will happen if development of the TK sites goes ahead.
- SA Objective 1 - "To contribute to reduction of greenhouse gases.." : not to increase them in the locality by the introduction of many more vehicles into a rural environment.
- SA Objective 2 - "To improve air quality.." : by the introduction of many more vehicles into this rural environment?
- SA Objective 3 - "To protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity." : development of the TK sites, by diminishing and concreting over Green Belt land, will self-evidently destroy and reduce biodiversity; and Parrots Drumble, a small remnant of ancient Woodland and a nature reserve, with its delicate wildlife and biodiversity balance, is extremely close to site TK10.
- SA Objective 4 - "To..maintain..land resources" : losing the agricultural land within the TK sites does precisely the opposite.
- SA Objective 7 - "To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings" : aside of the loss of Village distinctiveness and heritage already cited, the last of local dry-stone walling and the Village's central Cross (original 12Century base are directly in the firing line of the increased traffic
- SA Objective 8 - "To strengthen the quality of the landscape.." : development of the Green Belt TK sites would, on the contrary, diminish and despoil not only the quality of the landscape per se, but also the visual and physical amenity it provides to the Village.
- SA Objective 9 - "To enhance the quality..and connectivity of open space.." : building over large parts of such Geen Belt space self-evidently does exactly the opposite, reducing the quality and interrupting the connectivity of the of same.
- SA Objective 9 - "To improve the health and mental wellbeing of the population.." : increased traffic with greater pollution, the need for young children and patients to travel further afield to access school and health-care, a dangerous road environment, disintegration of an identifiable community, et al -how does this improve the health and welfare of the local population?

Accordingly, if the Council were to proceed with developing the TK sites, they would be in conflict with their own precepts. Not only does this render the FDL Plan not legally compliant (per 4.3 above), it also means that (unless the Council wishes deliberately to act in a non-legally-compliant manner), development of the TK sites cannot be affected as is. If such development cannot be affected then the FDL Plan, insofar as it relates to the TK sites, not effective.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Effective".

#### 5.4 Consistent with national policy

We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy,

for the following reasons :

- a) Transport - please see above re the local road system in the Village.
- b) Infrastructure - please see above re the Village infrastructure, namely school and health.
- c) Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites.
- d) Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.
- e) Health - please see above re pollution, degradation of environment, list dispersal, etc.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan is not consistent with national policy, especially insofar as the TK sites are concerned, so that it is not Sound under this head.

#### 6. SUGGESTED MODIFICATIONS

##### 6.1 Suggested Modification 1

- a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that that the number of proposed dwellings for all or some of the Talke sites be reduced.
- b) This can be compensated for as follows:
  - (1) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.
  - (ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.
  - (iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development,

as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.

(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.

(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.

The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).

Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.

**6.2 Suggested Modification 2**

That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:

a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.

b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.

c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.

It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.

**6.3 Suggested Modification 3**

That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

**6.4 Suggested Modification 4**

That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

**7. CONCLUSION**

For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".

Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.

However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.

We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.

## Q7 Modification

### SUGGESTED MODIFICATIONS

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**7. CONCLUSION**

For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".

Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.

However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.

We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.

<b>Comment ID</b>	NULLP1297
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Company / Organisation</b>	Talke Action Group
<b>Consultee Position</b>	Chairperson
<b>Consultee Family Name</b>	Butters
<b>Consultee Given Name</b>	C
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10



Q6 Details	<p>[Admin Note, the following statement has been supported by a form of authority with appropriately 172 signatures].</p> <p>Re: Newcastle-under-Lyme Borough Council ("the Council") Final Draft Local Plan 2020/2040 - Regulation 19 Consultation Please accept this letter as our representation in response to the above consultation, for onward submission to the Inspector.</p> <p><b>CONTENTS</b></p> <p>To assist you and the Inspector, the following is the order of our representation:</p> <ol style="list-style-type: none"> <li>1. Introductory comments.</li> <li>2. Personal details.</li> <li>3. Approach.</li> <li>4. Legally and procedurally compliant.</li> <li>5. Soundness (including each of the four heads, as set out in the National Planning Policy Framework).</li> <li>6. Suggested modifications.</li> <li>7. Conclusion.</li> </ol> <p><b>1. INTRODUCTORY COMMENTS</b></p> <p>We are the Talke Action Group ("TAG"), set up primarily to co-ordinate engagement with the Local Plan preparation process by the residents of the village of Talke/Talke Pits ("the Village"), part of the ward of Talke and Butt Lane in the borough of Newcastle-under-Lyme ("the Borough"). We are registered with the Council as a Consultee herein. In an effort to assist the Inspector, and as requested in the Planning Inspectorate's Guidance Note (Para 5.3 - "Where groups or individuals share a common view on the plan,...etc."), this letter of representation ("this letter") is respectfully submitted both on behalf of ourselves and also on behalf of all those individuals ("the signatories") who have signed the attached Forms of Authority, whereby they endorse this letter and the contents hereof as representing their joint and individual view. Accordingly, the term "our representation" as used herein reflects that this letter is the representation herein on behalf of both ourselves and the signatories, and the words "we" and "us" are similarly used.</p> <ul style="list-style-type: none"> <li>· In said attached Forms of Authority this letter is referred to as "the letter of representation".</li> <li>· Each of the signatories has so given said informed authority and endorsement following one-to-one drop-in engagement sessions during the Consultation period, between members of TAG and each signatory.</li> <li>· Our representation is submitted in letter form pursuant to advice that a letter is a proper and appropriate means of submission of Reg.19 representations, given by Councillor Fear, the Council's portfolio holder for Strategic Planning ("the Portfolio Holder").</li> </ul> <p><b>3. APPROACH</b></p> <ol style="list-style-type: none"> <li>a) In this letter, with regard to the concepts in parts 4 and 5 above, our representation follows the wording of para. 35 of the National Planning Policy Framework in force at this time.</li> <li>b) Pursuant to that wording, we do not consider that this Final Draft Local Plan ("the FDL Plan") has "been prepared in accordance with legal and procedural requirements" or that it is "sound". We are therefore raising objections to the FDL Plan under the pertinent heads.</li> <li>c) However, we are of the view that the Borough does need a Local plan, so that we do not wish to see the Plan struck down completely. Accordingly, where appropriate for each of the objections raised, this letter suggests relevant modifications.</li> <li>d) As we are residents of the Village, and are therefore largely not aware of detailed circumstance prevailing in other communities, most of our representations herein relate to the TK sites selected in the FDL Plan for development in the Village, namely sites TK6, TK10, TK17 and TK27 ("the TK sites"). However, because many of the reasons for which we consider the FDL Plan to be either not sound, or not legally/procedurally compliant, or both, relate to the FDL Plan as a whole insofar as they affect the TK sites, some representations are made regarding the FDL Plan as a whole but then show how they relate specifically to the Village and to the TK sites specifically. As in c) above, modifications are then suggested.</li> </ol> <p>Note: As the FDL Plan is a Council-derived document, we use the term "the Council" to refer also to the Council officers - elected and/or employed - engaged in guiding the FDL Plan through the process.</p> <p><b>NOT LEGALLY OR PROCEDURALLY COMPLIANT</b></p> <p>We do not believe the FDL Plan is legally/procedurally compliant.</p> <p><b>4.1 The consultation process</b></p> <p>Insofar as the residents of the Village are concerned, the consultation process has been drastically inadequate. Many, if not most of the residents, were until recently entirely unaware that a local plan was in the pipeline and equally unaware of the promulgation of the First Draft Local Plan or the FDL Plan. In our view, this inadequate consultation by the Council renders the FDL Plan non-compliant because :</p> <ol style="list-style-type: none"> <li>a) Community engagement       <ol style="list-style-type: none"> <li>(i) The Council may have given the appearance of complying, by sticking to minimum legal requirements regarding local plan community engagement, for example posting legal notices at the relevant sites and posting documents online. However, the Village population comprises a substantially larger than average percentage of older people, who do not or cannot engage with the internet. The Council will know this. Therefore, in accordance with its own Statement of Community Involvement (SCI), at para.1.13 (Equal Opportunity"), the Council should have taken additional steps "in the way in which (they) consult ... to meet the specific local needs". This the Council has not done during the whole process.</li> <li>(ii) This could - and indeed the SCI (at Table 2, p16) states that it will - be done by the distribution of "leaflets and posters". This does not appear to have been done for this local community with its "specific local need".</li> <li>(iii) Having regard to this failure to consult in a way which meets specific local needs, there are other instances by which the Council has further failed in any meaningful way, insofar as the Village and its demographic is concerned, to comply with its own SCI, for example para 1.9, Community Involvement ("Inform people...and provide information...at the earliest opportunity"); para1.15, Equal Opportunity (allowing the process to be "accessible to those who are unfamiliar with the terms, processes and structures of the planning system..."); para 2.1 ("Early and meaningful</li> </ol> </li> </ol>
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engagement..with..neighbourhoods..is essential"); and para 2.2 ("A range of methods and techniques will be used to involve communities..")

(iv) One clear item of evidence of the Councils failure to comply with its own SCI, and therefore to be legally compliant, relates to SCI para 1.14 (Equal Opportunity), which indicates that the Council will endeavour "to work in an inclusive manner" to deliver "planning services from the perspective of a range of potential users", including by "Organizing consultation events to maximise involvement..ie workshops." Yet, when holding such workshops was suggested at the relevant Scrutiny Committee meeting on 11.7.24, it was rejected out of hand using the spurious excuse that residents wouldn't be available!

(v) The Planning Inspectorate's own guidance/requirement document, in the part 3 "Legal Compliance" section, states clearly that "the process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement". To the extent that the FDL Plan, insofar as the Village is concerned and as evidenced in (i)-(iv) above, is not so in accordance, it is not legally compliant.

(vi) Lastly under this head we would like to point out that, although the Council loudly touts, as evidence of its engagement compliance, that it has allowed a consultation period which is longer than the minimum required (8 weeks instead of 6 weeks), it might as well be 1 week or 28 weeks - it makes no difference how long the consultation period is if ordinary residents have not been properly engaged with, taking into account not only the demographic of the Village per se but also the Council's obligations under their own SCI, both generally and given said demographic.

Conclusion: Because of the Council's failure, as above, to consult properly with the residents of the Village, given its specific demographic, the FDL Plan is not legally/procedurally compliant.

#### b) Consideration of consultation objections

It is self-evident, even to lay-persons such as we, that for a consultation to be meaningful and valid, the views, including any objections, of the consultees must be properly considered. If the consultation is treated by an LPA as merely a procedural formality, and the consultees' views arising thereout are not properly and fully considered, it is not a meaningful consultation, and the plan out of which the meaningless consultation arises cannot be legally compliant. We believe that this is the case with the FDL Plan, for the following reasons:

(i) In the Council's document in response to the Reg.18 consultation in respect of the First Draft of the Local Plan, where any proposed development site had had questions had been raised as to that site's suitability for development, the vast majority of the responses thereto was not a considered reply addressing any query, but merely a standard comment, the gist of which is that the site had been selected notwithstanding any objections raised nor addressing any such, and merely suggesting that any problems arising with any actual development could be dealt with when a planning application is made. The use of such an identical pro-forma response indicates clearly a lack of meaningful consideration of representations arising out of the consultation.

(ii) Further, those unconsidered responses not only evidence a lack of consideration of consultees' views, in itself rendering the consultation meaningless and the FDL Plan not legally compliant, but also fails to take into account circumstances where "planning" at the development stage will not solve the problem raised; or to offer any other solution. As examples, and with regard to the Village:

- what is the solution where there will be insufficient local school and/or health clinic places available as a consequence of development, but s106 funding would be of no use because there is no space in or around the existing facility for more staff to be employed or for an extension to be built?

- although construction of a roundabout might help with a substantially greater traffic flow at a dangerous junction, how will "planning" solve the problem of much greater traffic on the already dangerously congested main road through the village, which cannot be widened?

- How will planning considerations relating specifically and only to individual developments solve the larger problem of waste discharge in the locality? Viz: A report in 2023 covered the dumping of sewage into waterways by Severn Trent Water, revealing that during 2022 sewage was discharged into local waterways for 31,228 hours with 6,370 dumps in total. Alarming, the biggest polluter was the Liverpool Road works in Kidsgrove which discharged for 4,139 hours in 187 spills. This plant, which covers, inter alia, the Village as well as Butt Lane and Kidsgrove, clearly cannot cope with present demand. How will this plant cope with sewage from the hundreds of houses in the TK, BL and Kidsgrove sites? The Council appears not to have considered or addressed or informed consultees of how this will be dealt with.

We stress that we are not asking the Inspector to examine these issues. We raise them as exemplars and evidence that the Council has either deliberately ignored or simply failed properly to consider and/or to address consultees' views.

(iii) This apparent failure properly and fully to consider the views of consultees, and consequently having nothing of substance to report back to them, both further represent yet another failure by the Council to comply with its own SCI, this time Para 1.9, the aim to "Respond to any comments received, giving proper consideration and explanations of how these views will be incorporated into the planning documents and decisions."

(iv) A disturbing sequence of documents seems to indicate that the relevant officers had decided, well in advance of any scrutiny or vote, that the FDL Plan should be recommended for approval to a full meeting of the Council. For example, way back in January 2024, a report by the Corporate Leadership Team to the Cabinet recommended that the Cabinet "(a)uthorises the Deputy Chief Executive, in consultation with the Strategic Planning Portfolio Holder, to recommend to Council at its meeting on 24 July that it approves the Final Draft Local Plan (at Regulation 19 stage)...for public consultation.." Please note that the Cabinet decided, on 16 January 2024, to recommend approval of the FDL Plan to the full Council meeting on 24 July 2024, over 6 months before that meeting, and indeed before the FDL Plan was promulgated and possibly even before it was prepared. (On 18 March 2024, the Corporate Leadership Team presented this decision by the Cabinet to the relevant Scrutiny Committee for their meeting on the same day, and they appear to have had no issue with it.) This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation, rendering the consultation extremely, if not fatally, flawed.

Conclusion: Because the representations arising out of the Regulation 18 consultation were not adequately considered, the consultation has not been properly and/or meaningfully conducted, and therefore the FDL Plan is not legally/procedurally compliant.



#### 4.2 Procedural Compliance

Although it again appears on the surface that the Council has carefully followed all the over-arching procedural steps required in this process, there have been at least two somewhat alarming occurrences evidencing that this has not actually been the case on closer examination.

##### a) Site Selection

(i) In the Local Plan Issues and Options Report in 2022, preparatory to preparation of the First Draft Local Plan, the long list of possible sites indicated that three of the TK sites (TK10, TK17 and TK27) were "unsuitable" for development. By the time of promulgation of the First Draft Local Plan, they had somehow become suitable, without any apparent explanation. The implications of this are somewhat disturbing, let alone it representing another failure of the Council for its evidence base to be transparent and available, and for residents to be kept informed, as in 4.1 above. However, the following point might shed some light on the mysterious elevation of these three sites.

(ii) At the meeting of the relevant Scrutiny Committee meeting on 11 July 2024, the Portfolio Holder was repeatedly asked how the final list of sites included in the First Draft of the Local Plan were selected from the longer list and whether Cabinet Members were involved. The Portfolio Holder repeatedly obfuscated and ultimately refused to answer. However, it subsequently appears that said selection was made by the Portfolio Holder and two other senior councillors from the same side of the chamber.

(iii) Given these occurrences, it is open to conjecture as to whether or not it is a coincidence that a by far greater proportion of sites selected for development are situated in wards represented by councillors from the party in opposition to that of the Portfolio Holder's majority governing party.

Conclusion: Although the initial stages of the site selection process appear to have been conducted openly and compliantly, there are questions around the final stages of the site selection, rendering the process certainly procedurally (and possibly also legally) non-compliant.

##### b) Document Availability

(i) The FDL Plan was approved for consultation and submission at a full meeting of the Council on 24 July 2024. However, issues relating to document availability cloud its approval.

(ii) For Councillors to have been able to make an informed decision when voting, over 40 documents forming the evidence base and informing the FDL Plan, were required to be examined and considered. However, a large number of these documents were not made available to Councillors sufficiently timeously for them to be able to examine same and render themselves fully informed. Eight such documents (almost 20% of the total) were only uploaded to the relevant website the previous afternoon, leaving Councillors in outside employment around 24 hours to read and examine hundreds of pages of formal documentation whilst working during the day. (A further 7 documents were uploaded to the web the day before that, making a total of 15 documents - over one-third of the total number - only made available 48 hours before the meeting.)

(iii) The opposition Councillors therefore proposed an amendment, that the decision to approve the FDL Plan be slightly delayed until the next Council meeting only two months later, to allow all Councillors fully to consider all the relevant documents. This was defeated, with speakers from the Portfolio Holder's majority party insisting that the plan be approved on that day. Disturbingly, a senior councillor from that party stated categorically that all but two of the documents were made available timeously. The promulgated list of dates and times of uploading of all the documents shows that this statement was - knowingly or unknowingly - untrue.

(iv) It is not clear whether the above events were deliberate or not - we hope not. Nonetheless, it is the case that documents vital to the integrity of the FDL Plan were not made appropriately, timeously or compliantly to many of those being asked to make a decision on the FDL Plan and this in itself renders the process not procedurally compliant. This is even more the case because the Council could have obviated the difficulty by delaying the decision, but pointedly and deliberately chose not to.

(v) Speaking to the amendment referred to above, one councillor remarked: "The expectation that we approve a local plan without these essential documents is not only unreasonable but also undermines the principles of sound governance. This is a formal process that requires thorough scrutiny and understanding of all supporting evidence. We must be fully informed to ensure that the plan we endorse is both sound and legally compliant." They were not, so the plan is not.

##### c) Cross Party Engagement

(i) The Council's SCI, at para 2.23, requires the Council, in preparing a local plan, "to ensure cross party engagement on the plan making process..". In taking the steps in 4a and 4b above, the Council has again failed to comply with its own SCI.

Conclusion: Consequent on the above, the FDL is neither procedurally nor legally compliant.

4.3 Sustainability Assessment Objectives, Strategic Objectives, and Transport and Accessibility Policy Development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with same. (As details relating hereto are set out fully below, and as we would not wish the Inspector to have to read exactly the same content twice, we respectfully refer the Inspector to item 5.3,b ("Effective" head of "Soundness") below.)

Conclusion: Because of this, the FDL Plan, insofar as the TK sites are concerned, is not legally compliant.

#### 5. SOUNDNESS

##### 5.1 Positively prepared

No representations.

##### 5.2 Justified

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is justified. This is for the following reasons:

##### a) Number of dwellings proposed for the TK sites

(i) The number of dwellings proposed to be built over the TK sites (over 300) is disproportionate for this small semi-rural village. It is not justifiable that the Village should bear the burden of 7% of the total Local Plan Housing Allocation of 4512 houses (para 5.5, FDL Plan), when neither its population nor its housing stock are anything like that percentage of the Borough as a whole. When looking at the figures for the Talke and Butt Lane ward as a whole, the figure of 520 dwellings proposed to be built (per FDL Plan, paras 13.194 - 13.231) in the ward represents 11.5% of the proposed development for the whole Borough.

To impose this disproportionate burden on the village is not justified. (As to possible reasons for this high proportion of dwellings on the TK sites - all but 10 on greenbelt - being proposed to be imposed on the Village, we refer the Inspector back to point 4.2 above.)

Suggested Modification - Suggested Modification 1 below

b) The population of the Borough

The population of the Borough has only increased by 6.9% over the past four decades since 1981 (117,217 to 125,297, 1981-2022). The Council is allowing for an increase of 15% over the term. Even accepting that in matters of targets, some (but not all) issues are beyond the ambit of a Local authority, it is not justifiable that a greater proportion of what is already a possibly inflated target (ie above the national standard method calculation) should be borne by the Village. This is especially so when there are doubts about the motivation for and process of site selection, and there are brownfield sites (see c below) and empty homes (see 6.1,b,v below) available in the Borough which have not been selected.

Suggested Modification - Suggested Modification 1 below

c) Availability of brownfield sites

As indicated above (at point 4.2,a,i) the status of the Talke sites was changed from "unsuitable" to "suitable". At the same time, other sites (some brownfield) were changed from "suitable" to "unsuitable". These are however available and should be looked at again. For example, the unused and derelict Knutton Community Centre site was made available, but it appears that developers deemed the cost of eg decontamination to be too great and preferred untainted eg Green Belt land on which to build. The same is true of other available brownfield sites in the Borough. It cannot be justified for Green Belt land to be sacrificed in order to increase the profits of developers.

Suggested Modification - Suggested Modification 1 below

d) The effect on the nature of the Village

If all of the proposed 310 dwellings are built on the TK sites, and taking into account also development of sites such as the former TK5 site (see below at 6.1,b,iii) and any other windfall and/or buffer sites, this will represent an increase in the percentage of dwellings in the Village in the order of 20-30%! This volume of development is simply too great for Talke/Talke Pits. It would swamp the Village. It would irreparably and irreversibly change the nature of the Village from a semi-rural village to a sprawling dormitory town - although without the infrastructure to support it (see e below), rendering it with the worst of all worlds. To destroy the Village in this way by such a weight of development cannot be justified.

Suggested Modification - Suggested Modification 1 below.

e) Effect on local infrastructure

We appreciate that it is not within the ambit of this Regulation 19 Consultation for the Inspector to re-examine issues of local planning such as flooding or parking issues on the proposed development sites. However, where there are issues relating to off-site impacts, which have not been dealt with, either satisfactorily or at all, in the FDL Plan, then this goes to the Soundness of the FDL Plan under both heads of "Justified" and also "Effective" (as below).

The issue of the undealt-with problem of the knock-on effect of development of the TK sites on the Village as a whole, has been mentioned in passing at 4.1.b.ii above. It is not justifiable to propose a level of development on the Village which would exacerbate, and make critical, existing problems in a creaking and already inadequate infrastructure, without some level of pre-planning in the FDL Plan. Insofar as the Village is concerned, there appears to be none with regard to three major infrastructure problems which will arise should the TK site developments proceed, and which do not appear to be resolvable by specific planning arrangements for on-site or site-adjacent adaptations only. These are:

(i) As previously alluded to (4.1,b,ii), the volume of traffic (both local, and also that which uses the Village as a rat-run to avoid congestion on the nearby arterial routes of the A34, the A500 and the M6) through and in the Village is already greatly excessive for the Village road network. The main road ("the main road") through the Village (comprising High Street, Crown Bank and Swan Bank, which all run seamlessly into each other to form one thoroughfare through the Village), is also already inadequate and at breaking point. The road, like Pit Lane, is narrow and often reduced to a point where two cars, let alone trucks, cannot pass. When not congested, vehicles speed through, and the road is dangerous for pedestrians and vehicles alike, as well as for ingress/egress from local residences. There would be no easy solution to this, even without further development, as the road cannot be widened.

The addition of hundreds more vehicles (anything between 310 and 620) on to the main road through, and other roads in, the Village cannot but seriously exacerbate an already critical situation, and render the local road network inoperable.

As above (4.1,b,ii - also Failure properly to consult) the FDL plan does not appear to make any provision for this, nor even to consider it. It cannot be justifiable to allocate development sites without appearing to have any great, or any, concern about, or to make provision for, the drastically adverse knock-on effect which such development would have on the Village and its residents.

Suggested Modifications - Suggested Modifications 1 (or 2) below.

(ii) Similar concerns relate to the local health clinic (Talke Clinic, part of the North Newcastle Primary Care Network, "the Clinic"). Although we understand that their list is not, at date hereof, entirely full, the clinic as it is would simply not be able to take in the residents of 310 dwellings. However, the logistics are that the current building is full, so that no further health staff can physically be accommodated; and the site will not allow for further expansion. Accordingly, the usual solution of s106 funding to employ further staff and/or to expand the building, is not available.

Yet the Council again appears not to have considered nor to make any specific proposals to solve this problem (unlike elsewhere, eg at the proposed Keele site, where a health Hub is mooted). The only solution therefore appears to be that patients will need to attend GPs further afield, either at other practices in the North Newcastle PCT, or even at practices in other, further away, PCTs.

The over-arching Staffordshire and Stoke-on-Trent Integrated Care Board ("ICB") is quite clear - for them, such list-dispersal, with patients having to travel distances to see a doctor, is a very last option, a

last resort. The Council, however, seems, by failing to consider and actively to address the issue, in fact by default to be planning for the last resort in respect of the TK sites and the Village.

Inclusion of the TK sites in the FDL Plan cannot be justified where the health infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 3) below.

(iii) Again, there is a similar concern around local schooling, especially for children of primary school age. There is only one primary school in the Village, namely Springhead school ("the School"), to which the same problems (no unused internal space; no suitable site expansion room), again rendering s106 funding largely irrelevant. So, once again, primary school children will need to be found places further afield.

Inclusion of the TK sites in the FDL Plan cannot be justified where the school infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 4) below.

(iv) A further effect of (ii) and (iii) above, if patients and primary-age schoolchildren are listed or placed further afield, is additional car-journeys, and even worse exacerbation of the local road infrastructure problems, in (i) above. This cannot be justified.

(v) Lastly under e) hereof, although both the Staffs and Stoke ICB (regarding health issues) and the Staffordshire County Council (regarding education and other issues) have been consulted herein by the Council, it does not appear that the Council has actually approached or otherwise consulted directly with either the Clinic or the School, to ascertain from them the situation on the ground, so as to attempt to deal with it and/or to modify their site selection by eg removal of the TK sites from the FDL Plan, in light of these potentially insurmountable impact consequences. This cannot be justifiable.

f) Use of Green Belt land

Given all of the above - the disproportionate weight of development allocated for the TK sites, the questionable motivation for the site selection, the availability of brownfield sites and empty houses in the Borough, the fact that the Council would still meet its development target even without inclusion of the TK sites (see 6.1,b,i below), the detrimental effect that the proposed development on the TK sites would have on the Village, etc - it appears that there are no circumstances at all, let alone exceptional circumstances, which would necessitate or justify use of the Green Belt land proposed for the TK sites. Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Justified".  
5.3 Effective

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is effective. This is for the following reasons:

a) Viability

Because of the intractable infrastructure difficulties outlined above (at 5.2,e), we do not believe the development on the TK sites is viable. If it is not viable, it cannot be effected, and is accordingly not effective. Suggested Modifications - Suggested Modification 1 (or 2 - 4) below.

b) Sustainability Assessment (SA) Objectives, Strategic Objectives, and Transport and Accessibility Policy (Policy IN2)

As 4.3 above (not legally and/or procedurally compliant), development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with them. Some examples are:

- SO IV - to "reduce the Borough's carbon footprint..." : the introduction of many more vehicles into a rural environment will have the opposite effect.

- SO VI - to "support the vitality of rural villages, preserving and enhancing the special character (of)...each local community" : development of the TK sites will destroy the cohesion and vitality of the Village, and its special character.

- SO VI - to "provide choice in housing types for local people." : local residents do not want a choice of large development-based housing which will have the adverse and destructive effects referred to herein.

- 1N2 1 b - development must allow for "integration with existing infrastructure." : as herein, development of the TK sites will overwhelm the existing road infrastructure to a point of collapse.

- IN2 1,e - development must "not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking..arrangements.." : as herein, this is exactly what development of the TK sites will cause

- IN2 1,f - Development must "not cause severe residual impacts on the road network, either direct and/or cumulative." : extremely severe such impacts on the local road network, both direct and cumulative is exactly what will happen if development of the TK sites goes ahead.

- SA Objective 1 - "To contribute to reduction of greenhouse gases.." : not to increase them in the locality by the introduction of many more vehicles into a rural environment.

- SA Objective 2 - "To improve air quality.." : by the introduction of many more vehicles into this rural environment?

- SA Objective 3 - "To protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity." : development of the TK sites, by diminishing and concreting over Green Belt land, will self-evidently destroy and reduce biodiversity; and Parrots Drumble, a small remnant of ancient Woodland and a nature reserve, with its delicate wildlife and biodiversity balance, is extremely close to site TK10.

- SA Objective 4 - "To..maintain..land resources" : losing the agricultural land within the TK sites does precisely the opposite.

- SA Objective 7 - "To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings" : aside of the loss of Village distinctiveness and heritage already cited, the last of local dry-stone walling and the Village's central Cross (original 12Century base are directly in the firing line of the increased traffic

- SA Objective 8 - "To strengthen the quality of the landscape.." : development of the Green Belt TK sites would, on the contrary, diminish and despoil not only the quality of the landscape per se, but also the visual and physical amenity it provides to the Village.

· SA Objective 9 - "To enhance the quality..and connectivity of open space.." : building over large parts of such Green Belt space self-evidently does exactly the opposite, reducing the quality and interrupting the connectivity of the of same.

· SA Objective 9 - "To improve the health and mental wellbeing of the population.." : increased traffic with greater pollution, the need for young children and patients to travel further afield to access school and health-care, a dangerous road environment, disintegration of an identifiable community, et al –how does this improve the health and welfare of the local population?

Accordingly, if the Council were to proceed with developing the TK sites, they would be in conflict with their own precepts. Not only does this render the FDL Plan not legally compliant (per 4.3 above), it also means that (unless the Council wishes deliberately to act in a non-legally-compliant manner), development of the TK sites cannot be affected as is. If such development cannot be affected then the FDL Plan, insofar as it relates to the TK sites, is not effective.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Effective".

#### 5.4 Consistent with national policy

We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy,

for the following reasons :

- Transport - please see above re the local road system in the Village.
- Infrastructure - please see above re the Village infrastructure, namely school and health.
- Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites.
- Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.
- Health - please see above re pollution, degradation of environment, list dispersal, etc. Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan is not consistent with national policy, especially insofar as the TK sites are concerned, so that it is not Sound under this head.

### 6. SUGGESTED MODIFICATIONS

#### 6.1 Suggested Modification 1

- That all or some of the Talke sites be removed from the FDL Plan, or alternatively that the number of proposed dwellings for all or some of the Talke sites be reduced.
- This can be compensated for as follows:
  - The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.
  - The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.
  - What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.
  - As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.
  - Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.

The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).

Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.

#### 6.2 Suggested Modification 2

That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:

- Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.
- Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.
- Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to



	<p>allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.</p> <p>It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.</p> <p><b>6.3 Suggested Modification 3</b></p> <p>That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself,</p> <p>as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>6.4 Suggested Modification 4</b></p> <p>That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>7. CONCLUSION</b></p> <p>For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".</p> <p>Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.</p> <p>However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.</p> <p>We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.</p>
<b>Q7 Modification</b>	<p><b>SUGGESTED MODIFICATIONS</b></p> <p><b>6.1 Suggested Modification 1</b></p> <p>a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that that the number of proposed dwellings for all or some of the Talke sites be reduced.</p> <p>b) This can be compensated for as follows:</p> <p>(1) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.</p> <p>(ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.</p> <p>(iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.</p> <p>(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.</p> <p>(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.</p> <p>The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).</p> <p>Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.</p> <p><b>6.2 Suggested Modification 2</b></p> <p>That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:</p> <p>a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.</p> <p>b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.</p> <p>c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further.</p>

	<p>This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.</p> <p>It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.</p> <p><b>6.3 Suggested Modification 3</b></p> <p>That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself,</p> <p>as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>6.4 Suggested Modification 4</b></p> <p>That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>7. CONCLUSION</b></p> <p>For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".</p> <p>Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.</p> <p>However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.</p> <p>We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.</p>
<b>Comment ID</b>	NULLP1299
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Company / Organisation</b>	Talke Action Group
<b>Consultee Position</b>	Chairperson
<b>Consultee Family Name</b>	Butters
<b>Consultee Given Name</b>	C
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27
<b>Q6 Details</b>	<p>[Admin Note, the following statement has been supported by a form of authority with appropriately 172 signatures].</p> <p>Re: Newcastle-under-Lyme Borough Council ("the Council") Final Draft Local Plan 2020/2040 - Regulation 19 Consultation Please accept this letter as our representation in response to the above consultation, for onward submission to the Inspector.</p> <p><b>CONTENTS</b></p> <p>To assist you and the Inspector, the following is the order of our representation:</p> <ol style="list-style-type: none"> <li>1. Introductory comments.</li> <li>2. Personal details.</li> <li>3. Approach.</li> <li>4. Legally and procedurally compliant.</li> <li>5. Soundness (including each of the four heads, as set out in the National Planning Policy Framework).</li> <li>6. Suggested modifications.</li> <li>7. Conclusion.</li> </ol> <p><b>1. INTRODUCTORY COMMENTS</b></p> <p>We are the Talke Action Group ("TAG"), set up primarily to co-ordinate engagement with the Local Plan preparation process by the residents of the village of Talke/Talke Pits ("the Village"), part of the ward of Talke and Butt Lane in the borough of Newcastle-under-Lyme ("the Borough"). We are registered with the Council as a Consultee herein. In an effort to assist the Inspector, and as requested in the Planning Inspectorate's Guidance Note (Para 5.3 - "Where groups or individuals share a common view on the plan,...etc."), this letter of representation ("this letter") is respectfully submitted both on behalf of ourselves and also on behalf of all those individuals ("the signatories") who have signed the attached Forms of Authority, whereby they endorse this letter and the contents hereof as representing their joint and individual view. Accordingly, the term "our representation" as used herein reflects that this letter is the representation herein on behalf of both ourselves and the signatories, and the words "we" and "us" are similarly used.</p> <ul style="list-style-type: none"> <li>· In said attached Forms of Authority this letter is referred to as "the letter of representation".</li> <li>· Each of the signatories has so given said informed authority and endorsement following one-to-one drop-in engagement sessions during the Consultation period, between members of TAG and each signatory.</li> </ul>



· Our representation is submitted in letter form pursuant to advice that a letter is a proper and appropriate means of submission of Reg.19 representations, given by Councillor Fear, the Council's portfolio holder for Strategic Planning ("the Portfolio Holder").

### 3. APPROACH

a) In this letter, with regard to the concepts in parts 4 and 5 above, our representation follows the wording of para. 35 of the National Planning Policy Framework in force at this time.

b) Pursuant to that wording, we do not consider that this Final Draft Local Plan ("the FDL Plan") has "been prepared in accordance with legal and procedural requirements" or that it is "sound". We are therefore raising objections to the FDL Plan under the pertinent heads.

c) However, we are of the view that the Borough does need a Local plan, so that we do not wish to see the Plan struck down completely. Accordingly, where appropriate for each of the objections raised, this letter suggests relevant modifications.

d) As we are residents of the Village, and are therefore largely not aware of detailed circumstance prevailing in other communities, most of our representations herein relate to the TK sites selected in the FDL Plan for development in the Village, namely sites TK6, TK10, TK17 and TK27 ("the TK sites"). However, because many of the reasons for which we consider the FDL Plan to be either not sound, or not legally/procedurally compliant, or both, relate to the FDL Plan as a whole insofar as they affect the TK sites, some representations are made regarding the FDL Plan as a whole but then show how they relate specifically to the Village and to the TK sites specifically. As in c) above, modifications are then suggested.

Note: As the FDL Plan is a Council-derived document, we use the term "the Council" to refer also to the Council officers - elected and/or employed - engaged in guiding the FDL Plan through the process.

### NOT LEGALLY OR PROCEDURALLY COMPLIANT

We do not believe the FDL Plan is legally/procedurally compliant.

#### 4.1 The consultation process

Insofar as the residents of the Village are concerned, the consultation process has been drastically inadequate. Many, if not most of the residents, were until recently entirely unaware that a local plan was in the pipeline and equally unaware of the promulgation of the First Draft Local Plan or the FDL Plan. In our view, this inadequate consultation by the Council renders the FDL Plan non-compliant because :

##### a) Community engagement

(i) The Council may have given the appearance of complying, by sticking to minimum legal requirements regarding local plan community engagement, for example posting legal notices at the relevant sites and posting documents online. However, the Village population comprises a substantially larger than average percentage of older people, who do not or cannot engage with the internet. The Council will know this. Therefore, in accordance with its own Statement of Community Involvement (SCI), at para.1.13 (Equal Opportunity), the Council should have taken additional steps "in the way in which (they) consult ... to meet the specific local needs". This the Council has not done during the whole process.

(ii) This could - and indeed the SCI (at Table 2, p16) states that it will - be done by the distribution of "leaflets and posters". This does not appear to have been done for this local community with its "specific local need".

(iii) Having regard to this failure to consult in a way which meets specific local needs, there are other instances by which the Council has further failed in any meaningful way, insofar as the Village and its demographic is concerned, to comply with its own SCI, for example para 1.9, Community Involvement ("Inform people...and provide information...at the earliest opportunity"); para 1.15, Equal Opportunity (allowing the process to be "accessible to those who are unfamiliar with the terms, processes and structures of the planning system..."); para 2.1 ("Early and meaningful engagement...with...neighbourhoods...is essential"); and para 2.2 ("A range of methods and techniques will be used to involve communities..")

(iv) One clear item of evidence of the Council's failure to comply with its own SCI, and therefore to be legally compliant, relates to SCI para 1.14 (Equal Opportunity), which indicates that the Council will endeavour "to work in an inclusive manner" to deliver "planning services from the perspective of a range of potential users", including by "Organizing consultation events to maximise involvement...ie workshops." Yet, when holding such workshops was suggested at the relevant Scrutiny Committee meeting on 11.7.24, it was rejected out of hand using the spurious excuse that residents wouldn't be available!

(v) The Planning Inspectorate's own guidance/requirement document, in the part 3 "Legal Compliance" section, states clearly that "the process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement". To the extent that the FDL Plan, insofar as the Village is concerned and as evidenced in (i)-(iv) above, is not so in accordance, it is not legally compliant.

(vi) Lastly under this head we would like to point out that, although the Council loudly touts, as evidence of its engagement compliance, that it has allowed a consultation period which is longer than the minimum required (8 weeks instead of 6 weeks), it might as well be 1 week or 28 weeks - it makes no difference how long the consultation period is if ordinary residents have not been properly engaged with, taking into account not only the demographic of the Village per se but also the Council's obligations under their own SCI, both generally and given said demographic.

Conclusion: Because of the Council's failure, as above, to consult properly with the residents of the Village, given its specific demographic, the FDL Plan is not legally/procedurally compliant.

##### b) Consideration of consultation objections

It is self-evident, even to lay-persons such as we, that for a consultation to be meaningful and valid, the views, including any objections, of the consultees must be properly considered. If the consultation is treated by an LPA as merely a procedural formality, and the consultees' views arising thereout are not properly and fully considered, it is not a meaningful consultation, and the plan out of which the meaningless consultation arises cannot be legally compliant. We believe that this is the case with the FDL Plan, for the following reasons:

(i) In the Council's document in response to the Reg.18 consultation in respect of the First Draft of the Local Plan, where any proposed development site had had questions had been raised as to that site's suitability for development, the vast majority of the responses thereto was not a considered reply

addressing any query, but merely a standard comment, the gist of which is that the site had been selected notwithstanding any objections raised nor addressing any such, and merely suggesting that any problems arising with any actual development could be dealt with when a planning application is made. The use of such an identical pro-forma response indicates clearly a lack of meaningful consideration of representations arising out of the consultation.

(ii) Further, those unconsidered responses not only evidence a lack of consideration of consultees' views, in itself rendering the consultation meaningless and the FDL Plan not legally compliant, but also fails to take into account circumstances where "planning" at the development stage will not solve the problem raised; or to offer any other solution. As examples, and with regard to the Village:

- what is the solution where there will be insufficient local school and/or health clinic places available as a consequence of development, but s106 funding would be of no use because there is no space in or around the existing facility for more staff to be employed or for an extension to be built?

- although construction of a roundabout might help with a substantially greater traffic flow at a dangerous junction, how will "planning" solve the problem of much greater traffic on the already dangerously congested main road through the village, which cannot be widened?

- How will planning considerations relating specifically and only to individual developments solve the larger problem of waste discharge in the locality? Viz: A report in 2023 covered the dumping of sewage into waterways by Severn Trent Water, revealing that during 2022 sewage was discharged into local waterways for 31,228 hours with 6,370 dumps in total. Alarming, the biggest polluter was the Liverpool Road works in Kidsgrove which discharged for 4,139 hours in 187 spills. This plant, which covers, inter alia, the Village as well as Butt Lane and Kidsgrove, clearly cannot cope with present demand. How will this plant cope with sewage from the hundreds of houses in the TK, BL and Kidsgrove sites? The Council appears not to have considered or addressed or informed consultees of how this will be dealt with.

We stress that we are not asking the Inspector to examine these issues. We raise them as exemplars and evidence that the Council has either deliberately ignored or simply failed properly to consider and/or to address consultees' views.

(iii) This apparent failure properly and fully to consider the views of consultees, and consequently having nothing of substance to report back to them, both further represent yet another failure by the Council to comply with its own SCI, this time Para 1.9, the aim to "Respond to any comments received, giving proper consideration and explanations of how these views will be incorporated into the planning documents and decisions."

(iv) A disturbing sequence of documents seems to indicate that the relevant officers had decided, well in advance of any scrutiny or vote, that the FDL Plan should be recommended for approval to a full meeting of the Council. For example, way back in January 2024, a report by the Corporate Leadership Team to the Cabinet recommended that the Cabinet "(a)uthorises the Deputy Chief Executive, in consultation with the Strategic Planning Portfolio Holder, to recommend to Council at its meeting on 24 July that it approves the Final Draft Local Plan (at Regulation 19 stage)...for public consultation.." Please note that the Cabinet decided, on 16 January 2024, to recommend approval of the FDL Plan to the full Council meeting on 24 July 2024, over 6 months before that meeting, and indeed before the FDL Plan was promulgated and possibly even before it was prepared. (On 18 March 2024, the Corporate Leadership Team presented this decision by the Cabinet to the relevant Scrutiny Committee for their meeting on the same day, and they appear to have had no issue with it.) This sequence of events cannot but reflect a lack of meaningful consideration of anything arising out of the Reg 18 consultation, rendering the consultation extremely, if not fatally, flawed.

Conclusion: Because the representations arising out of the Regulation 18 consultation were not adequately considered, the consultation has not been properly and/or meaningfully conducted, and therefore the FDL Plan is not legally/procedurally compliant.

#### 4.2 Procedural Compliance

Although it again appears on the surface that the Council has carefully followed all the over-arching procedural steps required in this process, there have been at least two somewhat alarming occurrences evidencing that this has not actually been the case on closer examination.

##### a) Site Selection

(i) In the Local Plan Issues and Options Report in 2022, preparatory to preparation of the First Draft Local Plan, the long list of possible sites indicated that three of the TK sites (TK10, TK17 and TK27) were "unsuitable" for development. By the time of promulgation of the First Draft Local Plan, they had somehow become suitable, without any apparent explanation. The implications of this are somewhat disturbing, let alone it representing another failure of the Council for its evidence base to be transparent and available, and for residents to be kept informed, as in 4.1 above. However, the following point might shed some light on the mysterious elevation of these three sites.

(ii) At the meeting of the relevant Scrutiny Committee meeting on 11 July 2024, the Portfolio Holder was repeatedly asked how the final list of sites included in the First Draft of the Local Plan were selected from the longer list and whether Cabinet Members were involved. The Portfolio Holder repeatedly obfuscated and ultimately refused to answer. However, it subsequently appears that said selection was made by the Portfolio Holder and two other senior councillors from the same side of the chamber.

(iii) Given these occurrences, it is open to conjecture as to whether or not it is a coincidence that a by far greater proportion of sites selected for development are situated in wards represented by councillors from the party in opposition to that of the Portfolio Holder's majority governing party.

Conclusion: Although the initial stages of the site selection process appear to have been conducted openly and compliantly, there are questions around the final stages of the site selection, rendering the process certainly procedurally (and possibly also legally) non-compliant.

##### b) Document Availability

(i) The FDL Plan was approved for consultation and submission at a full meeting of the Council on 24 July 2024. However, issues relating to document availability cloud its approval.

(ii) For Councillors to have been able to make an informed decision when voting, over 40 documents forming the evidence base and informing the FDL Plan, were required to be examined and considered. However, a large number of these documents were not made available to Councillors sufficiently timeously for them to be able to examine same and render themselves fully informed. Eight such documents (almost 20% of the total) were only uploaded to the relevant website the previous afternoon, leaving Councillors

in outside employment around 24 hours to read and examine hundreds of pages of formal documentation whilst working during the day. (A further 7 documents were uploaded to the web the day before that, making a total of 15 documents - over one-third of the total number - only made available 48 hours before the meeting.)

(iii) The opposition Councillors therefore proposed an amendment, that the decision to approve the FDL Plan be slightly delayed until the next Council meeting only two months later, to allow all Councillors fully to consider all the relevant documents. This was defeated, with speakers from the Portfolio Holder's majority party insisting that the plan be approved on that day. Disturbingly, a senior councillor from that party stated categorically that all but two of the documents were made available timeously. The promulgated list of dates and times of uploading of all the documents shows that this statement was - knowingly or unknowingly - untrue.

(iv) It is not clear whether the above events were deliberate or not - we hope not. Nonetheless, it is the case that documents vital to the integrity of the FDL Plan were not made appropriately, timeously or compliantly to many of those being asked to make a decision on the FDL Plan and this in itself renders the process not procedurally compliant. This is even more the case because the Council could have obviated the difficulty by delaying the decision, but pointedly and deliberately chose not to.

(v) Speaking to the amendment referred to above, one councillor remarked: "The expectation that we approve a local plan without these essential documents is not only unreasonable but also undermines the principles of sound governance. This is a formal process that requires thorough scrutiny and understanding of all supporting evidence. We must be fully informed to ensure that the plan we endorse is both sound and legally compliant." They were not, so the plan is not.

#### c) Cross Party Engagement

(i) The Council's SCI, at para 2.23, requires the Council, in preparing a local plan, "to ensure cross party engagement on the plan making process..". In taking the steps in 4a and 4b above, the Council has again failed to comply with its own SCI.

Conclusion: Consequent on the above, the FDL is neither procedurally nor legally compliant.

4.3 Sustainability Assessment Objectives, Strategic Objectives, and Transport and Accessibility Policy Development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with same. (As details relating hereto are set out fully below, and as we would not wish the Inspector to have to read exactly the same content twice, we respectfully refer the Inspector to item 5.3,b ("Effective" head of "Soundness") below.)

Conclusion: Because of this, the FDL Plan, insofar as the TK sites are concerned, is not legally compliant.

## 5. SOUNDNESS

### 5.1 Positively prepared

No representations.

### 5.2 Justified

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is justified. This is for the following reasons:

#### a) Number of dwellings proposed for the TK sites

(i) The number of dwellings proposed to be built over the TK sites (over 300) is disproportionate for this small semi-rural village. It is not justifiable that the Village should bear the burden of 7% of the total Local Plan Housing Allocation of 4512 houses (para 5.5, FDL Plan), when neither its population nor its housing stock are anything like that percentage of the Borough as a whole. When looking at the figures for the Talke and Butt Lane ward as a whole, the figure of 520 dwellings proposed to be built (per FDL Plan, paras 13.194 - 13.231) in the ward represents 11.5% of the proposed development for the whole Borough. To impose this disproportionate burden on the village is not justified. (As to possible reasons for this high proportion of dwellings on the TK sites - all but 10 on greenbelt - being proposed to be imposed on the Village, we refer the Inspector back to point 4.2 above.)

Suggested Modification - Suggested Modification 1 below

#### b) The population of the Borough

The population of the Borough has only increased by 6.9% over the past four decades since 1981 (117,217 to 125,297, 1981-2022). The Council is allowing for an increase of 15% over the term. Even accepting that in matters of targets, some (but not all) issues are beyond the ambit of a Local authority, it is not justifiable that a greater proportion of what is already a possibly inflated target (ie above the national standard method calculation) should be borne by the Village. This is especially so when there are doubts about the motivation for and process of site selection, and there are brownfield sites (see c below) and empty homes (see 6.1,b,v below) available in the Borough which have not been selected.

Suggested Modification - Suggested Modification 1 below

#### c) Availability of brownfield sites

As indicated above (at point 4.2,a,i) the status of the Talke sites was changed from "unsuitable" to "suitable". At the same time, other sites (some brownfield) were changed from "suitable" to "unsuitable". These are however available and should be looked at again. For example, the unused and derelict Knutton Community Centre site was made available, but it appears that developers deemed the cost of eg decontamination to be too great and preferred untainted eg Green Belt land on which to build. The same is true of other available

brownfield sites in the Borough. It cannot be justified for Green Belt land to be sacrificed in order to increase

the profits of developers.

Suggested Modification - Suggested Modification 1 below

#### d) The effect on the nature of the Village

If all of the proposed 310 dwellings are built on the TK sites, and taking into account also development of sites such as the former TK5 site (see below at 6.1,b,iii) and any other windfall and/or buffer sites, this will represent an increase in the percentage of dwellings in the Village in the order of 20-30%! This volume of development is simply too great for Talke/Talke Pits. It would swamp the Village. It would irreparably and irreversibly change the nature of the Village from a semi-rural village to a sprawling

dormitory town - although without the infrastructure to support it (see e below), rendering it with the worst of all worlds. To destroy the Village in this way by such a weight of development cannot be justified.

Suggested Modification - Suggested Modification 1 below.

e) Effect on local infrastructure

We appreciate that it is not within the ambit of this Regulation 19 Consultation for the Inspector to re-examine issues of local planning such as flooding or parking issues on the proposed development sites. However, where there are issues relating to off-site impacts, which have not been dealt with, either satisfactorily or at all, in the FDL Plan, then this goes to the Soundness of the FDL Plan under both heads of "Justified" and also "Effective" (as below).

The issue of the undealt-with problem of the knock-on effect of development of the TK sites on the Village as a whole, has been mentioned in passing at 4.1.b.ii above. It is not justifiable to propose a level of development on the Village which would exacerbate, and make critical, existing problems in a creaking and already inadequate infrastructure, without some level of pre-planning in the FDL Plan. Insofar as the Village is concerned, there appears to be none with regard to three major infrastructure problems which will arise should the TK site developments proceed, and which do not appear to be resolvable by specific planning arrangements for on-site or site-adjacent adaptations only. These are:

(i) As previously alluded to (4.1.b.ii), the volume of traffic (both local, and also that which uses the Village as

a rat-run to avoid congestion on the nearby arterial routes of the A34, the A500 and the M6) through and in the Village is already greatly excessive for the Village road network. The main road ("the main road") through the Village (comprising High Street, Crown Bank and Swan Bank, which all run seamlessly into each other to form one thoroughfare through the Village), is also already inadequate and at breaking point. The road, like Pit Lane, is narrow and often reduced to a point where two cars, let alone trucks, cannot pass. When not congested, vehicles speed through, and the road is dangerous for pedestrians and vehicles alike, as well as for ingress/egress from local residences. There would be no easy solution to this, even without further development, as the road cannot be widened.

The addition of hundreds more vehicles (anything between 310 and 620) on to the main road through, and other roads in, the Village cannot but seriously exacerbate an already critical situation, and render the local road network inoperable.

As above (4.1.b.ii - also Failure properly to consult) the FDL plan does not appear to make any provision for this, nor even to consider it. It cannot be justifiable to allocate development sites without appearing to have any great, or any, concern about, or to make provision for, the drastically adverse knock-on effect which such

development would have on the Village and its residents.

Suggested Modifications - Suggested Modifications 1 (or 2) below.

(ii) Similar concerns relate to the local health clinic (Talke Clinic, part of the North Newcastle Primary Care Network, "the Clinic"). Although we understand that their list is not, at date hereof, entirely full, the clinic as it is would simply not be able to take in the residents of 310 dwellings. However, the logistics are that the current building is full, so that no further health staff can physically be accommodated; and the site will not allow for further expansion. Accordingly, the usual solution of s106 funding to employ further staff and/or to expand the building, is not available.

Yet the Council again appears not to have considered nor to make any specific proposals to solve this problem (unlike elsewhere, eg at the proposed Keele site, where a health Hub is mooted). The only solution therefore appears to be that patients will need to attend GPs further afield, either at other practices in the North Newcastle PCT, or even at practices in other, further away, PCTs.

The over-arching Staffordshire and Stoke-on-Trent Integrated Care Board ("ICB") is quite clear - for them, such list-dispersal, with patients having to travel distances to see a doctor, is a very last option, a last resort. The Council, however, seems, by failing to consider and actively to address the issue, in fact by default to be planning for the last resort in respect of the TK sites and the Village.

Inclusion of the TK sites in the FDL Plan cannot be justified where the health infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 3) below.

(iii) Again, there is a similar concern around local schooling, especially for children of primary school age. There is only one primary school in the Village, namely Springhead school ("the School"), to which the same problems (no unused internal space; no suitable site expansion room), again rendering s106 funding largely irrelevant. So, once again, primary school children will need to be found places further afield.

Inclusion of the TK sites in the FDL Plan cannot be justified where the school infrastructure of the Village is so lacking and unaddressed.

Suggested Modifications - Suggested Modifications 1 (or 4) below.

(iv) A further effect of (ii) and (iii) above, if patients and primary-age schoolchildren are listed or placed further afield, is additional car-journeys, and even worse exacerbation of the local road infrastructure problems, in (i) above. This cannot be justified.

(v) Lastly under e) hereof, although both the Staffs and Stoke ICB (regarding health issues) and the Staffordshire County Council (regarding education and other issues) have been consulted herein by the Council, it does not appear that the Council has actually approached or otherwise consulted directly with either the Clinic or the School, to ascertain from them the situation on the ground, so as to attempt to deal with it and/or to modify their site selection by eg removal of the TK sites from the FDL Plan, in light of these potentially insurmountable impact consequences. This cannot be justifiable.

f) Use of Green Belt land

Given all of the above - the disproportionate weight of development allocated for the TK sites, the questionable motivation for the site selection, the availability of brownfield sites and empty houses in the Borough, the fact that the Council would still meet its development target even without inclusion of the TK sites (see 6.1.b.i below), the detrimental effect that the proposed development on the TK sites would have on the Village, etc - it appears that there are no circumstances at all, let alone exceptional circumstances, which would necessitate or justify use of the Green Belt land proposed for the TK sites.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Justified".



### 5.3 Effective

We do not believe the FDL Plan, insofar as the Village and the effect that development of the TK sites will have

thereon, is effective. This is for the following reasons:

#### a) Viability

Because of the intractable infrastructure difficulties outlined above (at 5.2,e), we do not believe the development on the TK sites is viable. If it is not viable, it cannot be effected, and is accordingly not effective. Suggested Modifications - Suggested Modification 1 (or 2 - 4) below.

#### b) Sustainability Assessment (SA) Objectives, Strategic Objectives, and Transport and Accessibility Policy (Policy IN2)

As 4.3 above (not legally and/or procedurally compliant), development as proposed on the TK sites would not only fail to comply with and meet the standards required by these policies and objectives, but would indeed be directly contrary to and inimical with them. Some examples are:

- SO IV - to "reduce the Borough's carbon footprint..." : the introduction of many more vehicles into a rural environment will have the opposite effect.

- SO VI - to "support the vitality of rural villages, preserving and enhancing the special character (of)...each local community" : development of the TK sites will destroy the cohesion and vitality of the Village, and its special character.

- SO VI - to "provide choice in housing types for local people." : local residents do not want a choice of large development-based housing which will have the adverse and destructive effects referred to herein.

- 1N2 1 b - development must allow for "integration with existing infrastructure." : as herein, development of the TK sites will overwhelm the existing road infrastructure to a point of collapse.

- IN2 1,e - development must "not cause unacceptable highway safety problems in relation to local traffic circulation and existing parking..arrangements.." : as herein, this is exactly what development of the TK sites will cause

- IN2 1,f - Development must "not cause severe residual impacts on the road network, either direct and/or cumulative." : extremely severe such impacts on the local road network, both direct and cumulative is exactly what will happen if development of the TK sites goes ahead.

- SA Objective 1 - "To contribute to reduction of greenhouse gases.." : not to increase them in the locality by the introduction of many more vehicles into a rural environment.

- SA Objective 2 - "To improve air quality.." : by the introduction of many more vehicles into this rural environment?

- SA Objective 3 - "To protect, enhance and restore biodiversity ensuring that there is an overall net gain in the extent and quality of biodiversity." : development of the TK sites, by diminishing and concreting over Green Belt land, will self-evidently destroy and reduce biodiversity; and Parrots Drumble, a small remnant of ancient Woodland and a nature reserve, with its delicate wildlife and biodiversity balance, is extremely close to site TK10.

- SA Objective 4 - "To..maintain..land resources" : losing the agricultural land within the TK sites does precisely the opposite.

- SA Objective 7 - "To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings" : aside of the loss of Village distinctiveness and heritage already cited, the last of local dry-stone walling and the Village's central Cross (original 12Century base are directly in the firing line of the increased traffic

- SA Objective 8 - "To strengthen the quality of the landscape.." : development of the Green Belt TK sites would, on the contrary, diminish and despoil not only the quality of the landscape per se, but also the visual and physical amenity it provides to the Village.

- SA Objective 9 - "To enhance the quality..and connectivity of open space.." : building over large parts of such Green Belt space self-evidently does exactly the opposite, reducing the quality and interrupting the connectivity of the of same.

- SA Objective 9 - "To improve the health and mental wellbeing of the population.." : increased traffic with greater pollution, the need for young children and patients to travel further afield to access school and health-care, a dangerous road environment, disintegration of an identifiable community, et al -how does this improve the health and welfare of the local population?

Accordingly, if the Council were to proceed with developing the TK sites, they would be in conflict with their own precepts. Not only does this render the FDL Plan not legally compliant (per 4.3 above), it also means that (unless the Council wishes deliberately to act in a non-legally-compliant manner), development of the TK sites cannot be effected as is. If such development cannot be effected then the FDL Plan, insofar as it relates to the TK sites, not effective.

Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan, insofar as it relates to the TK sites, is not Sound under the head of "Effective".

### 5.4 Consistent with national policy

We do not believe that the FDL plan, insofar as the TK sites are concerned, is consistent with national policy,

for the following reasons :

a) Transport - please see above re the local road system in the Village.

b) Infrastructure - please see above re the Village infrastructure, namely school and health.

c) Landscape/Environment - please see above re unnecessary use of Green Belt land for the proposed TK sites.d) Location - please see above re overwhelming a rural village when other brownfield sites and empty houses are available.

e) Health - please see above re pollution, degradation of environment, list dispersal, etc. Suggested Modification - Suggested Modification 1 below.

Conclusion: The FDL Plan is not consistent with national policy, especially insofar as the TK sites are concerned, so that it is not Sound under this head.

## 6. SUGGESTED MODIFICATIONS

### 6.1 Suggested Modification 1

a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that that the number of proposed dwellings for all or some of the Talke sites be reduced.

b) This can be compensated for as follows:

(1) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.

(ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.

(iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.

(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.

(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.

The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).

Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.

#### 6.2 Suggested Modification 2

That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:

- Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.
- Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.
- Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.

It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.

#### 6.3 Suggested Modification 3

That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

#### 6.4 Suggested Modification 4

That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.

### 7. CONCLUSION

For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".

Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.

However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.

We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.



<p><b>Q7 Modification</b></p>	<p><b>SUGGESTED MODIFICATIONS</b></p> <p><b>6.1 Suggested Modification 1</b></p> <p>a) That all or some of the Talke sites be removed from the FDL Plan, or alternatively that the number of proposed dwellings for all or some of the Talke sites be reduced.</p> <p>b) This can be compensated for as follows:</p> <p>(1) The FDL Plan, at para 5.5 (Housing Requirement and Supply Information figures), indicates that, whereas the Housing Requirement is 8000 dwellings over the duration of the plan ("the term"), the FDL plan allows for 8,663 units. The additional 663 units are made up of 372 expected additional units becoming available over the term - the windfall allowance - and a buffer of 291 units (figure not shown at para 5.5). The windfall allowance alone more than adequately compensates even if all the Talke sites were to be removed from the FDL Plan.</p> <p>(ii) The use of brownfield sites excluded from the FDL Plan site selection, and especially those whose status was previously changed from "suitable" to "unsuitable", with no transparent explanation, should be revisited. Development of some or all of these could mitigate or obviate the need for the Talke Green Belt sites to be included in the FDL Plan.</p> <p>(iii) What was site TK5 - a brownfield site at the top end of the main road through the Village, and very close to TK27 - was originally shown as "suitable" but, in 2022, unavailable for housing development, as it was then in active commercial employment use (by London Hoist). However, it has since become available and is in fact at date hereof on the market for sale by a local agent (Louis Taylor) with outline planning permission for 32 dwellings. This should be brought back into account and reduce the suggested quota for eg TK27 by a concomitant number.</p> <p>(iv) As at (ii) above, there are a number of other brownfield sites over the Borough as a whole, to which similar considerations apply, namely that they are suitable for development, but are not included in the FDL Plan, such as the derelict Knutton Community Centre site. As in (ii) above, these could all be looked at again, in preference to Green Belt sites such as the Talke sites.</p> <p>(v) Similarly, reducing or eliminating the Talke sites could be easily compensated for by use of homes currently empty in the Borough.</p> <p>The Council's own website (Empty Houses page) asks "Did you know there are over 1,000 empty properties in Newcastle-under-Lyme?" Even using more modest figures, there were 503 empty homes in the Borough in 2022/3 (Government's national New Homes Bonus figures) and 511 in 2023 (Action on Empty Homes, based on Govt. Data published by the (then) Dept. for Levelling Up and Housing, Nov. 2023).</p> <p>Yet, despite this number of empty homes being available, the council only brought back into use 39 homes in the year Oct 2021-Oct 2022, and a meagre 11 homes 2022-2023 (same sources, based on CTB figures); and they are now proposing that Green Belt land be sacrificed, when all this possible housing lies unused.</p> <p><b>6.2 Suggested Modification 2</b></p> <p>That drastic measures be taken to mitigate the impact of additional vehicles consequent on development of the TK sites, for example:</p> <p>a) Barriers be erected at either end of the main road allowing ingress/egress only for Village residents, emergency services, deliveries, workers, etc.</p> <p>b) Entrance to and exit from TK27, currently via Coppice Road, should in turn require egress to/ingress from Coppice Road only to and from the main arterial A5011 (Linley Road). That would at any rate be necessitated by erection of aforementioned residential barrier between the top of Coppice Road and Swan Bank.</p> <p>c) Similarly for TK10, having all the additional vehicles from a 170-dwelling site feeding into the main road at the Crown Bank/Swan Bank/Jamage Road junction would exacerbate the situation even further. This could be controlled by limiting access to and from Pit Lane to the bottom end (roundabout at Pit Lane/Jamage Road/Oaktree junction), and creating a one-way system; as well as widening Pit Lane to allow it to deal with the extra traffic in addition to the current already heavy HGV use and substantial outside traffic visiting the Affinity shopping hub on Pit Lane.</p> <p>It is appreciated that these suggestions are probably impractical for a number of reasons, but that in itself serves to illustrate how intractable and insurmountable the problem is. It also suggests that development of the TK sites is unviable (per 5.3 above). The best solution therefore appears to be Suggested Modification 1 above.</p> <p><b>6.3 Suggested Modification 3</b></p> <p>That the Council be asked to consult with the ICB specifically about the Clinic, and directly with the Clinic itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>6.4 Suggested Modification 4</b></p> <p>That the Council be asked to consult with the SCC, and also directly with the School Organization Team, specifically about the School, as well as directly with the School itself, as to possible solution and, if there is none, to accept that Suggested Modification 1 should apply.</p> <p><b>7. CONCLUSION</b></p> <p>For all the reasons above, we believe that the FDL Plan is neither Sound nor (per para 35 NPPF) "in accordance with legal and procedural requirements".</p> <p>Notwithstanding, we are not requesting that the FDL Plan be struck down. We recognize that the Borough needs a strong and robust local plan which, in most aspects, the FDL is.</p> <p>However, nor are we "nimby"s. Had the proposals in the FDL Plan for a local contribution to the Borough's housing need been for a reasonable number of dwellings in, or in the vicinity of, the Village, and not on precious and valuable Green Belt land, this representation would in all probability not have been submitted. It is not, however, reasonable for not only the character, but the very nature, of the Village to be irreversibly damaged and probably destroyed, by the building of a number of houses way out of proportion to the size of the Village, and greatly out of kilter to the ratio of the population of the Village to the Borough as a whole. It is not unreasonable that an objection be raised to this.</p>
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We therefore request the Inspector, for all the reasons herein, to modify the FDL Plan and respectfully refer the Inspector to Suggested Modification 1 above.

<b>Comment ID</b>	NULLP195
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	National Grid Electricity
<b>Consultee Family Name</b>	Buxton
<b>Consultee Given Name</b>	Nick
<b>Agent Family Name</b>	White
<b>Agent Given Name</b>	Lucy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Site Allocation TB19: Land South of Newcastle Golf Club, Thistleberry</p> <p>In response to the draft Local Plan, National Grid expressed concerns regarding the absence of any reference within the policy allocation to the presence of 132kV overhead lines which run through the centre of the site, roughly north to south. The overhead lines represent essential infrastructure for the delivery of electricity to homes and businesses in Newcastle-Under-Lyme and surrounding area. The diversion or undergrounding of the line is unlikely to achieve a visual benefit to the scheme due to the need for new terminal towers at either end of the undergrounded section and the need for a protected easement over the undergrounded cables where development is not permitted.</p> <p>NGED welcomes the amendment to Policy TB19 through the Regulation 19 version of the Plan which incorporates reference to the NGED infrastructure. However, reference to the overhead lines is only included within the supporting text to the Policy TB19. In order to ensure the presence of the lines is given adequate weight as a policy consideration in the design of the proposals, NGED requests that the provisions at paragraph 13.250 are introduced into the Policy Text under Policy TB19.</p> <p>NGED supported the policy requirement for a masterplan-led approach to the site's development set out within the Regulation 18 draft of the Plan. However, this requirement appears to have been removed from the Regulation 19 version of the policy, despite the complex issues and constraints associated with the site. NGED objects to this omission and requests reinstatement of this requirement into Policy TB19. In the absence of the above, Policy TB19 is considered to be unsound in respect of deliverability of the allocation over the plan period.</p> <p>NGED also requests that the LPA ensures the steps outlined above have been followed to ensure the National Grid has sufficient capacity to accommodate the development strategy prior to submission of the plan for examination.</p> <p>Should Officers have any concerns or queries regarding the above, please contact me to discuss further</p>
<b>Q10 File 1</b>	6385583
<b>Attachments</b>	<a href="#">1306866 Lucy White letter.pdf</a>
<b>Comment ID</b>	NULLP197
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	National Grid Electricity
<b>Consultee Family Name</b>	Buxton
<b>Consultee Given Name</b>	Nick
<b>Agent Family Name</b>	White
<b>Agent Given Name</b>	Lucy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1

## Q6 Details

Dear Sirs,

**NEWCASTLE-UNDER-LYME REGULATION 19 LOCAL PLAN - REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WEST) PLC**

These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 version of the Local Plan, which is subject to public consultation until 7th October.

**Introduction**

NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

**Towards Net Zero**

The Government is committed to achieve net zero by 2050. The shift towards electricity to heat our homes and power our cars is critical to achieving this goal and the National Grid is playing a crucial role in meeting this commitment by increasing capacity to meet the growing demand for electricity. Our network investment planning process is the strategic approach we are taking to investing in our network, ensuring that it can meet future demand in the right place, at the right time while ensuring good value for money for customers.

To ensure that we can provide the network you need from us, your projects need to be included in our Distribution Future Energy Scenarios. We use this information to predict the future requirements on our network and decide when and where to invest in the network. This ensures that our strategic network planning provides sufficient network capacity as the country transitions to net zero.

We ask Local Authorities about their future plans, including information in your Local Plan annually (normally in May/June). This will inform our future forecasts down to Electricity Supply Area level ensuring we can connect new developments in 5 years and beyond.

NGED strongly recommends that local planning authorities ensure that they feed into the Distribution Futures Energy Scenario process by emailing [nged.energyplanning@nationalgrid.co.uk](mailto:nged.energyplanning@nationalgrid.co.uk) and that you contact them at the earliest possible opportunity for confirmation of National Grid's capacity to accommodate planned growth in their area. If capacity is limited, LPAs should explore alternative locations for growth which may be less constrained or allocate land, in consultation with NGED, to accommodate a new sub-station. NGED should also be involved in the masterplanning of any development allocation which includes a large sub-station.

Please ensure this process has been completed prior to submission of the Local Plan for examination.

**132kV Overhead Lines**

Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

- a) whether the lines can be accommodated within the development site; or
- b) the viability and feasibility of diverting and/or undergrounding overhead lines.

This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy.

In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding, the need for additional new infrastructure and its visual impact, including larger terminal towers at either end of an undergrounded line, and the potential impact on timescales for delivery of the development.

LPAs should also be aware that where high voltage electricity lines are undergrounded National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features. A 10m wide corridor of open ground is required above the undergrounded cables. Accordingly, the retention of overhead lines in situ provides greater opportunities to deliver an efficient and effective masterplan, with the potential to deliver a range of uses beneath the lines including green infrastructure, public highway, drainage features and some biodiversity net gain measures.

NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.

**National Grid Capacity**

In light of the above, NGED requires LPAs to make early enquiries to ensure the National Grid has sufficient capacity to accommodate planned growth. If electricity capacity is limited, the LPA should engage with NGED to ascertain whether a new sub-station can be introduced to increase capacity and if so, where this should be located. Land should be safeguarded for the sub-station through the Local Plan. The timescales for delivery of a new sub-station and the implications for occupation of new homes should be taken into account in preparing the LPA's housing trajectory.

**Summary**

NGED does not object to the allocation of land upon which its infrastructure is present, however, in the context of the Government's commitment to reach Net Zero by 2050 and the role which National Grid has to play in delivering significant new infrastructure to meet existing and future energy demands, all reasonable efforts should be made by LPAs and developers to safeguard to retain the existing grid infrastructure and the associated embodied carbon.

In preparing Local Plans, LPAs should take the following steps:

1. Ensure your Local Authority is responding annually to our Distribution Future Energy Scenario questionnaire that is sent out via Regen.

	<p>2. Contact NGED as early as possible in the Plan making process to establish whether capacity exists in the grid to accommodate planned development.</p> <p>3. Where land is allocated, priority should be given to retention of high voltage overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.</p> <p>4. Where necessary, early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;</p> <p>5. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.</p> <p>6. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines and safeguarding of land to accommodate new sub-stations, where necessary, with the agreement of NGED.</p>
<b>Q10 File 1</b>	6385583
<b>Attachments</b>	<a href="#">1306866 Lucy White letter.pdf</a>

<b>Comment ID</b>	NULLP810
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy PSD5: Green Belt</p> <p>Policy PSD5 confirms that the Green Belt boundary is defined on the Policies Map, and that within the Green Belt, proposals will be assessed in accordance with the NPPF and the need to demonstrate very special circumstances for inappropriate development.</p> <p>The Green Belt boundary has been subject to incremental changes historically to support the growth of the campus site. The emerging Local Plan does propose removal of land from the Green Belt including the identification of Keele village as an inset village outside of the Green Belt and also the allocation of site KL15 to the east. We object to Development Boundary as proposed and recommend that it is amended in line with the plan at Appendix A of this representation to reflect the operational extent of the University campus site.</p> <p>It is acknowledged that Very Special Circumstances can be pursued through the Development Management process to support proposals in such areas. However, it is considered that Exceptional Circumstances can be demonstrated at this stage to make minor amendments to the boundaries to support future proposals.</p> <p>In this regard, the Strategic Objective of the emerging Local Plan is re-iterated:  “Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development, supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.”</p> <p>It is a key objective of the emerging Local Plan to “enable the growth of Keele University”. However, due to the tightly drawn nature of the Green Belt around the existing infrastructure, car parks, roads, buildings and built form, there is little flexibility provided to support any new development of supporting facilities on campus including supporting infrastructure (e.g. parking, improved all weather pitches or other sport, health and wellbeing facilities). This would be contrary to the Strategic Objective as it would not ‘enable the growth’ of the University. Indeed, the Green Belt boundary would have the opposite effect and be restrictive to future development.</p> <p>The campus facilities currently located within the Green Belt include sports facilities in the northern part of the campus site including all weather pitches, tennis courts, parking as well as sports and estates facilities buildings. The evidence base for the Local Plan indicates that further investment is needed in these facilities to support current and future demand in the Borough. This evidence includes:</p> <ul style="list-style-type: none"> <li>• Infrastructure delivery plan (2024), which identifies need for new playing pitches at Keele University.</li> <li>• Playing Pitch Strategy and Action Plan (2020), which identifies future shortfalls in adult pitch (for football and rugby going forward. The ancillary facilities at both Chesterton Community Sports College and Keele University Sports Centre are considered to be relatively dated and tired with both sites accommodating both community, curricular and extracurricular demand. Future investment and commitment to improvement and maintenance of facilities for hockey at the University campus are also recommended.</li> </ul> <p>Feasibility studies of potential proposals as part of the CIP have shown the importance of the adjacency of any new sport, health and wellbeing facility to the existing playing pitches. Any new facility would need to be supported by a suitable all weather pitch, improving the capacity, quality and accessibility of both indoor and outdoor resources. The current Development Boundary and Green Belt prevent the most appropriate siting which would allow new fit for purpose facilities to be developed without any loss of service as well as making the new improved facilities more accessible to University staff, students as well as Borough residents.</p> <p>The existing boundary also limits viable options associated with the reuse of heritage assets (Keele Hall, the Clock House, the Walled Garden) within the southern part of the site. There is sufficient protection of the campus’ assets from other local and national planning policies relating to historic park and gardens, listed buildings and playing pitches, to avoid the need for the additional Green Belt restrictions.</p> <p>The Green Belt Site Review (July 2024) considers land surrounding, though not land forming part of and adjoining the campus site. Land proposed for release under references KL12,14,15 is all assessed as making a weak contribution to Green Belt, as is KL21 to the west of the campus. The latter site is only discounted from further consideration for release based on its detached position from a defined settlements boundary.</p> <p>By contract, the land immediately to the north and south of campus is directly associated with the function of the University and should be included within the Development Boundary on that basis.</p> <p>3.38</p>



	<p>The Council's Green Belt Part 2 assessment study (paragraph 4.4) identified that:  "...the principal factors that the Borough Council consider capable of amounting to 'exceptional circumstances' and would therefore justify amendment to the Green Belt boundary are:  •Newcastle-under-Lyme's Housing Need.  •Newcastle-under-Lyme's House Prices &amp; Affordability Issues.  •Newcastle-under-Lyme's Affordable Housing Need.  •Establishing a demographic balance to support identified employment growth.  •Providing higher value jobs within the Plan area and taking advantage of the socio-economic benefits of the success of Keele, whilst seeking to retain and attract graduates and encouraging greater embryonic business creation."</p> <p>In order to secure the above referenced benefits, investment in existing and supporting infrastructure should be facilitated without an overly restrictive policy context.</p> <p>The Council's Green Belt Exceptional Circumstances Review (2019) confirms that in relation to the exceptional circumstances for Keele, paragraphs 3.13-3.26 of the Preferred Options consultation documents and paragraph 6.5-6.10 of the Green Belt Technical Paper set out the business need and benefits to sustainable development of employment and housing growth in this location. Given the very specific set of circumstances which apply to Keele, the Council has considered reasonable alternatives but concluded that it would not be possible to reproduce this form of development elsewhere.</p> <p>The facilities provided within the campus site, including the leisure and community facilities to the north and heritage assets to the south are currently included within the Green Belt in the draft plan. However, they form an important part of campus infrastructure and the future CIP as well as making an important contribution to the local community. As acknowledged in the Rural Topic Paper (appendix 6), there are strong sustainability links between the campus and the village of Keele, with policies to strengthen investment in these facilities having a subsequently beneficial impact on Keele Village.</p> <p>As acknowledged by the Site Selection report, a masterplanning exercise has informed proposals for the Keele University Growth Corridor, and policies need to support the comprehensive delivery of this vision. The University is a major asset for the Borough and the strategic objectives in the draft Local Plan should enable the growth of the University.</p>
<b>Q7 Modification</b>	<p>Recommendations</p> <p>The wider areas of the campus site, which form an important part of the campus masterplan, and directly adjoin the Development Boundary of the campus should be removed from the Green Belt and included within the Development Boundary.</p> <p>It is recommended that the Development Boundary is amended as indicated in Appendix A.</p> <p>The justification for this is set out above and the amendments will ensure the growth of the University is enabled, in accordance with the Strategic Objective including:</p> <ul style="list-style-type: none"> <li>•SO-9 Support physical activity including sport &amp; recreation</li> <li>•SO-10 Enable the growth of Keele University</li> <li>•PSD3 Distribution of Development - Provide a range of essential services &amp; facilities to support an appropriate level of growth</li> <li>•PSD6 Health &amp; Wellbeing - Provide access to accessible sports facilities</li> <li>•CRE1 Climate Change - Opportunities to extend Keele district heating network</li> </ul> <p>Exceptional Circumstances can be identified within the emerging Local Plan with reference to the future expansion requirements of the University and the economic importance of the institution to the area, as well as the importance of the facilities in this part of the campus to the local community, as set out further below.</p> <p>The proposed amendments to the Green Belt boundary is considered to be relatively minor in nature, albeit important to the economic vision, and will not undermine the purposes of including land within the Green Belt.</p> <p>This approach is justified in accordance with the Strategic Objective and with reference to future educational requirements. The above recommendations will ensure that the emerging plan is positively prepared, justified, effective and consistent with national policy, and therefore sound in accordance with Paragraph 35 of the National Planning Policy Framework</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>
<b>Comment ID</b>	NULLP804
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy PSD2: Settlement Hierarchy</p> <p>Policy PSD2 indicates that the Rural Centres in the Borough comprise; Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint).</p> <p>It is firstly noted that this designation does not mirror the terminology used in the updated Policies Map published at this stage, which identifies a 'Proposed Development Boundary' around the majority of the University campus. The use of terminology relating to Rural Centre and Proposed Development Boundaries should be consistent across all documents to avoid confusion in understanding the plan as a whole.</p> <p>Notwithstanding this, of the six locations within the Emerging Plan identified as Rural Centre Areas, five comprise established service villages performing a traditional residential-led function for the community. The Keele University campus area is identified jointly within the policy with the Keele village area, despite the two areas being defined by two separate boundaries on the Policies Map. The campus area comprises education and research-related employment functions, a purpose-built range of residential accommodation for a largely transient student population, and other services and facilities to meet the specific needs of the University. It does not therefore share the same characteristics of the other Rural Centres, however this is not recognised within the wording of Policy PSD2.</p> <p>It is not considered that given the unique characteristics of the University campus when compared with other Rural Centres, that Policy PSD2 adequately addresses the unique requirements of the University over the Plan Period. The policy should therefore be revised to ensure the role and status of the University is adequately recognised and the policy is appropriately worded to enable the growth of the university as required by the Strategic Objectives of the emerging Local Plan.</p>
<b>Q7 Modification</b>	<p>Recommendation</p> <p>Within the above context, we strongly recommend that inconsistencies between the designation of the Keele University campus as a Rural Centre within the draft policies, and the Proposed Development Boundary designations within the Policies Map documents are rectified to ensure that the documents are effective.</p> <p>We further recommend that the Rural Centre Area designation is removed and the entire campus is subject to a separate and distinct policy designation, which recognises the current ranges of facilities within the site and the opportunities provided for future housing and employment growth and investment in the campus. This is in order to ensure that the plan is positively prepared and effective.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>
<b>Comment ID</b>	NULLP808
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy PSD3: Distribution of Development</p> <p>Policy PSD3 provides the distribution of development across the Borough based on the Settlement Hierarchy and the requirement set out in Policy PSD1.</p> <p>The policy states that the strategic centre of Newcastle-under-Lyme is expected to accommodate in the order of 5,200 new homes; the urban centre of Kidsgrove is expected to accommodate in the order of 800 new homes; and the rural centres are expected to accommodate development of the scale shown below:</p> <ul style="list-style-type: none"> <li>•Audley and Bignall End (joint) in the order of 250 new homes</li> <li>•Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint) in the order of 250 new homes</li> </ul>

	<ul style="list-style-type: none"> <li>•Loggerheads in the order of 450 new homes</li> <li>•Baldwins Gate in the order of 250 new homes</li> <li>•Keele and Keele University (joint) in the order of 800 new homes</li> </ul> <p>The University is supportive of the overall approach to providing new homes. However, it is important to meet the requirements of the University population, as well as the broader Borough requirements. It is therefore recommended that the housing target set out in Policy PSD3 is clearly identified as a minimum figure. This will ensure the growth aspirations of the plan as a whole are met.</p>
<b>Q7 Modification</b>	<p>Recommendation</p> <p>We strongly recommend that the wording of the Policy is revised at various points to remove the wording 'in the order of' and replaced with 'a minimum of'. This will support the objectives of the NPPF and local policy objectives including PSD1 to support appropriate provision of accommodation within the Borough.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>
<b>Comment ID</b>	NULLP812
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy SE6: Open Space, Sports and Leisure Provision</p> <p>There are several issues raised by the 'Open Space Strategy Sites' designation on the Site as shown on the adopted Proposals Map. We object to the application of this designation as shown on the Policies Map in relation to the University campus on the following basis.</p> <p>The 'Open Space Strategy Sites' designation as identified on the Policies Map is not directly referenced in any of the written policies of the draft plan raising adding uncertainty regarding the implications of the designation. The areas covered by the designation are based on a 2022 report prepared by RSK. However, that report was written as a strategic assessment of general areas and was not intended to form the basis for specific large scale blanket open space designations.</p> <p>There is reference to the designation within the supporting text to Policy SE6, however the policy itself is a generic open space policy, which could be applied to relevant areas of open space, without the need to identify these on the Proposals Map. Other policy protection is also afforded to open spaces surrounding sensitive areas such as heritage assets, which appropriately protects these spaces from inappropriate development.</p> <p>If Policy SE6 were to be applied to Open Space Strategy areas, as currently drafted, the wording makes the application of the policy unclear. Part 2 of the policy fails to specify after each bullet point whether this is a cumulative or single scenario test (whereby accordance with one element of the policy avoids the need to comply with other elements). This should be amended to reflect the intentions of open space guidance in the NPPF. The wording of the policy also fails to reflect the unique circumstances of the University campus in terms of the protection and provision of open space areas. The University recognises that much of the area to the east and southeast is Green Belt, except for KL13 and KL15 which are the subject of separate designation. Much of the campus lies within an historic park and gardens or is within the curtilage of listed buildings. To the north and north west there are significant areas of playing pitches upon which any development would be controlled through the development management process including consultation with Sport England.</p> <p>The areas to which the designation applies within the Keele University campus includes existing infrastructure, car parks, roads, buildings and built form (as shown on the OS base map to the Council's own plans as per Figures 2 and 3 of this document), which should not be covered by such a designation. Furthermore, the Council's Open Space and Green Infrastructure Study 2022 does not identify the campus for proposed strategic GI intervention (pg 138). The Study notes that the site is appropriately managed as part of the University's greenspace estate, indicating that further safeguarding beyond broader policies nationally and locally to protect biodiversity is not necessary.</p> <p>The University recognises the amenity &amp; ecology value of the green spaces within the campus and notes the importance of Policy SE8 on Biodiversity. With the centrality of the campus to Keele University</p>

	<p>student and staff recruitment and securing local businesses, the University is aware of the role as custodian of an important land resource. There is adequate protection for the campus as an important land resource within the general written policies as drafted, and the Open Space designation in the Proposals Map is therefore not required.</p> <p>The designation as drafted would dramatically restrict any redevelopment proposals within the campus and would add additional complexity where overlapped with other policy designations. The policy is not justified, particularly where there is existing infrastructure, car parks, roads, buildings and built form already present, is not consistently applied as other areas of the campus including proposed designations KL13 and KL15 are not covered by this designation despite being green in character and would not support the significant investment in the campus required to ensure the University remains sustainable in the long term.</p> <p>The blanket protection of large areas of incidental space and built form, tenuously linked to an unclear open space policy will cause great confusion and uncertainty and is unnecessary and harmful to the overall objectives of the plan.</p>
<b>Q7 Modification</b>	<p><b>Recommendations</b></p> <p>Within the above context, we strongly recommended that the Open Space Strategy Sites designation is removed from the Policies Map.</p> <p>This amendment will ensure that the plan is positively prepared and effective in supporting the continued investment in and growth of the University, as an important economic asset to the Borough.</p> <p>3.60</p> <p>Should a designation be sought to reflect the outcomes of the Open Space and Green Infrastructure Study 2022, this policy designation should be more specifically defined to reflect the objectives of specific written policies, such as Policy SE6. It is not considered to be appropriate to apply the designation to the Keele University campus given the specific circumstances and developed nature of this site. It is the University's aspirations to enhance the overarching biodiversity of the site and the protection of green infrastructure within this area will benefit from protection under other national and local ecology related policies and legislation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>
<b>Comment ID</b>	NULLP809
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy PSD4: Distribution of Development</p> <p>Policy PSD4 (Development Boundaries and the Open Countryside) sets out how development proposals will be considered in Rural Centres, stating in part 2 of the policy that:</p> <p>"Within Settlement Boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan."</p> <p>Notwithstanding the representations made above about the clarity and appropriateness of the Rural Centres designation, the grouping of the University site with Keele village in the written text to the draft Plan fails to recognise the distinct character of the campus and the range of uses and typologies of development that may be required within it.</p> <p>Thought Part 3 of PSD4 does support some forms of development in the open countryside outside of the development boundary, in the case of the wider Keele University campus, this area is covered by Green Belt policies, restricting development in these areas. These areas include existing and anticipated University sport, health and wellbeing facilities which the University has identified need to be replaced to allow the University to adequately attract future students, to provide sufficient capacity serve increased numbers of the local community and support the development of these anticipated sport, health and wellbeing facilities whilst continuing to operate existing facilities. The continued inclusion of such areas within the Green Belt will restrict the enhancement of and future investment in these key facilities.</p>

<b>Q7 Modification</b>	<p>Recommendation</p> <p>For the reasons set out in the Green Belt section of this representation, the Keele University development boundary should be extended to incorporate wider areas of the existing University campus, as identified in Appendix A. This approach will support the long term investment plans and growth strategy and ensure that the policy is positively prepared.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.</p>
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>
<b>Comment ID</b>	NULLP814
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Keele University
<b>Consultee Family Name</b>	Cain
<b>Consultee Given Name</b>	Jonathan
<b>Agent Family Name</b>	Plant
<b>Agent Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy CRE2: Renewable Energy</p> <p>As illustrated within the University's Vision document provided at Appendix B, the University has aspirations to provide renewable energy infrastructure within the campus, or at locations where such infrastructure will contribute to meeting the University's energy needs.</p> <p>The University welcomes that Policy CRE2 would support the development of renewable or sustainable energy technologies over the Plan Period. There are however concerns that certain parts of the policy are overly restrictive. For example, part 7 of the Policy requires large scale solar energy proposals to demonstrate that available brownfield sites have been examined and discounted before greenfield development is considered. We however believe that Policy CRE2 should recognise that renewable energy proposals can also have a specific locational requirement, particularly when they are directly associated to an existing community or use. This would be the case with the University and the need to place such infrastructure within or adjacent to the existing Campus.</p> <p>We also highlight that Paragraph 163 of the NPPF states that when determining planning applications for renewable and low carbon development, local planning authorities should approve the application if its impacts are (or can be made) acceptable. There is no requirement in the NPPF for solar energy proposals to be provided on brownfield sites, therefore, this element of the policy is not consistent with the NPPF.</p>
<b>Q7 Modification</b>	<p>In light of the above, we recommend that Policy CRE2 is amended to remove the requirement for brownfield sites to be examined and discounted before greenfield sites are considered. We also recommend that the policy recognises that there are locational requirements for such infrastructure, particularly where it is required in support of an existing use</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>We request the right to make representations on behalf of Keele University, in order to examine the Council's evidence in support of the proposed approach to Green Belt and Open Space matters in order to ensure that the plan is effective and justified within the context of the University's future investment proposals, and with reference to the importance of this investment for the wider economy of Newcastle Under Lyme.</p>
<b>Q10 File 1</b>	6389305
<b>Attachments</b>	<a href="#">1363804 Clare Plant.pdf</a>

<b>Comment ID</b>	NULLP1368
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Carr
<b>Consultee Given Name</b>	Glen
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1420
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Carr
<b>Consultee Given Name</b>	Glen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Further comments regarding the proposed development:</p> <ul style="list-style-type: none"> <li>- inadequate local health care facilities - doctors closed 2 years ago/ no dentists available</li> <li>- School capacity is not what stated in this report with class sizes already high!</li> <li>- additional traffic on an already congested road, used as a cut through</li> <li>- type of house being built do not suit average wages in Newcastle under Lyme (Newcastle is a low income area)</li> <li>- developments are encircling Red Street and Chesterton, no green spaces!</li> <li>- house sales are slow in this area, lower demand</li> <li>- no affordable houses</li> <li>- development proximity to M6 is what is being considered by developer to locals!</li> </ul>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP46
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Carter
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Dear councillors, we wish to strongly object to proposals contained in the draft local plan to build new houses on prime agricultural land at Mucklestone. It is strange that these plans have been retained on the plan when Newcastle's own planning committee threw them out.</p> <p>There are many reasons why the plan for housing should be abandoned. The local protest committee has already sent you a very detailed response so we will not restate all their points.</p> <p>It seems to us that the site is not the right location because there is no appropriate infrastructure locally to support the development. Public transport is very limited. Residents would need to travel everywhere by private car. The council's planning committee agreed that this was an important consideration.</p> <p>The council's own document "Rural Area Topic Paper " says this : "GP access is dependent on travel to Ashley and there is no direct bus service to the hospital; Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme). Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The site is on prime agricultural farmland and is clearly a greenfield location. It is close to a Grade 11 listed building.</p> <p>The village of Loggerheads has already seen upwards of 1,000 new houses in recent years. It would be an act of vandalism to add to this list. Local people now have to put up with a vast increase in traffic which gives rise to major pollution from both noise and exhaust fumes. Loggerheads is a village. Not a town. We do not wish these problems to be spread along Mucklestone Wood Lane to the picturesque village of Mucklestone,</p> <p>We note that since this housing plan was rejected by your planning committee the number of proposed houses has risen to 450. Where has this number come from? It is a disturbing revelation. Who came up with this number? It does not sound arbitrary. But it is suspicious.</p> <p>The people of Loggerheads and Mucklestone have had to accept that nearly 1,000 new houses have already been built against most of their wishes. Isn't that sufficient? Don't you think we have fulfilled our random quota? Perhaps it just happens that we live in a place you find convenient for your local plan. A place where you can dump lots of houses because it's the easy way to solve a problem. People who live here do not want hundreds more cars and a sudden inability to get a doctor's appointment.</p>

<b>Comment ID</b>	NULLP488
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Carter
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I object to the the following planning:</p> <p>&gt; AB12, AB2, AB15 and AB33</p> <p>&gt; 1. NuLBC are applying a high growth strategy. They present no evidence that this will transpire. In the village of audley and surrounds there are small pockets of land that are being developed appropriately and proportionately to the surrounds. Larger scale housing is not required, therefore I feel this is unjustified and unsound.</p> <p>&gt; 2. AB2: NuLBC say they require 22 Ha of strategic employment land. However, they are allocating 80 Ha at the AB2 site alone. This is not justified therefore not sound. There are already huge warehousing within our vicinity, some laying empty and some already under development. There is no evidence to suggest this building is required.</p> <p>&gt; 3. AB2: The already high levels of traffic at junction16 of the M6 and the surrounding villages means that the junction will require a major upgrade. The required funding from Highways England is unlikely to be forthcoming due to the £22 billion shortfall in the nations finances. This is not deliverable before the end of the local plan period (2040), therefore it is ineffective hence unsound. To add to this the A500 is already at capacity meaning that increased traffic would be detrimental to our local community. It's obscene to think that all increased traffic won't result in increased traffic on our rural roads. These roads being predominantly terraced streets, when built were not designed for multi car occupants or heavy traffic. Please do view in particular ravens lane and new road.</p> <p>&gt; 4. AB12 (125 dwellings): This site has very limited accessibility. Proposed access points are at the bottom of Diglake Street and via the track adjacent to 104 Raven's Lane. These points are too narrow for long term access, especially given that local roads are beyond capacity at peak times. This is not deliverable making it ineffective. Therefore, it is unsound. Planning for this site proposes a car park which would not be appropriate of the residents who live here, particularly the elderly and disabled.</p> <p>&gt; 5. AB12 represents a high quality contribution to the green belt. Building 125 homes here would exacerbate flooding into the nearby Brierley Brook. This would take away climate mitigation and contributions to our food security, not just from this site but also from neighbouring fields that will be affected by flooding. This site is therefore not justified and consequently unsound.</p> <p>&gt; 6. AB15 (33 dwellings) and AB33 (55 dwellings): Similar arguments to item 5 above can be applied to these allocations also. Therefore, these allocations are similarly unsound.</p> <p>&gt; 7. All allocations in the Audley and Bignall End area for housing are in the green belt. Moreover, as proposed developments they would increase traffic flow well beyond the capacity of the current road system as well as placing added pressure on local schools and GP's surgeries etc. These allocations are therefore not justified, hence unsound.</p> <p>&gt; Solution: To render the local plan sound, remove these allocations from the local plan.</p> <p>&gt; I would further like to add a personal note. (redacted by admin), I want to stress the importance of our community here, our children "go outside to play" these green spaces are invaluable. At a time where mental health in young people is a pandemic problem let's not allow this to happen to our children, who won't be children forever. We want everyone to enjoy this wonderful village, this generation and many more to come. The wildlife in our village is amazing, from owls and bats to badgers and hedgehogs. We WANT to keep it this way. Trees are natures carbon catchers, it is vital that these green belt areas are protected and cherished. Staffordshire County council should be utilising brown field sites over green belt.</p>

<b>Comment ID</b>	NULLP1085
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The policy does not make explicit reference to the bus service improvements, and associated infrastructure, that were included within ED011 Strategic Transport Assessment.</p> <p>The policy references transport infrastructure within the travel plan requirements which is incorrect as a travel plan is not a mechanism to deliver infrastructure</p>
<b>Q7 Modification</b>	<p>Suggested revised policy wording:</p> <p>Development of a Public Transport Strategy that will identify how the site will be served by bus utilising intelligence contained within the Employment and Skills Plan.</p> <p>Implementation of an agreed comprehensive travel plan incorporating measures to support travel to/ from the development, particularly by sustainable modes to enable the impact of the development to be monitored.</p> <p>Provision of appropriate routes to enable active modes to access the site including cycle parking and associated amenities.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Staffordshire County Council wishes to participate to discuss this issue if it remains unresolved.
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1089
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Site SP11 (Lyme Park, Silverdale) lies Southwest of Walleys Quarry and Landfill, it is allocated for residential, and community uses within a wider Country Park setting, measuring in totality 75.742 ha. SP11(4) is allocated as a development for 100 homes.</p> <p>Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the local plan.</p> <p>The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase.</p> <p>In addition, Policy SP11, page 135, SP11 (4) has an incorrect spelling, "...no dwellings will be occupied before the cessation of the disposal of non-hazardous waste at the <i>Whalley's Quarry Landfill site</i>,...", this should be changed to the correct spelling Walleys Quarry Landfill Site.</p>

	Non-reactive hazardous waste is allowed until 2026.
<b>Q7 Modification</b>	<p>The Borough Council should be aware that operations at Walleys Quarry landfill site will not cease at the end of 2026. Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states</p> <p>“The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 <b>and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</b> in accordance with the requirements of Condition 37 and 39 below”.</p> <p>There is a landfill gas utilisation compound on the south-east extend of the landfill (the latest planning permission for the gas compound was granted in October 2013 ref. N.13/04/216 MW. Condition 16 states:</p> <p>“When the gas utilisation plant is no longer required for the generation of electricity from landfill gas within the landfill site, all buildings, plant, machinery and foundations shall be removed from the Site and the land restored in accordance with the final restoration scheme which is required by Condition 35 of planning permission IDO/N/1 or any subsequent Restoration and Aftercare Scheme as has previously been approved in writing by the Mineral Planning Authority”.</p> <p>Additional text should be added concerning the following:</p> <p>The Newcastle under Lyme Borough Council Environmental Health Team and the Environment Agency should be satisfied there would be no unacceptable risks from pollution (e.g. dust, odour, noise and light) to any occupants of the housing development as a result of the proximity to the neighbouring waste management facility; and the housing development would not constrain the continued operation of the neighbouring waste management facility (Walleys Quarry landfill site).</p> <p>In addition, Policy SP11 on page, 135, SP11 (4) has an incorrect spelling, “...no dwellings will be occupied before the cessation of the disposal of non-hazardous waste at the <i>Whalley’s Quarry Landfill site,...</i>”, this should be changed to the correct spelling for Walleys Quarry Landfill Site.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1093
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The housing growth proposed in the Plan has resulted in a necessity to expand secondary school provision at Madeley High school, as set out in Policy IN1. Land is allocated for the expansion to the school and the policies map shows a redrawing of the Green Belt boundary to remove the land required for the expansion. However, Policy PSD5 doesn't specifically list this in bullet point 2 with the other allocations that remove land from the Green Belt. It is assumed this is simply an oversight as elsewhere in the Plan provision is made for the Green Belt Boundary to be changed to accommodate the delivery of the school expansion.</p>
<b>Q7 Modification</b>	Insert a new point o. in bullet 2 of PSD5 to list 'Land at Madeley High School'.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1066
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Staffordshire County Council



<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The Staffordshire Public Health and Prevention Team are particularly supportive of Policy PSD6: Health and Wellbeing. The requirements outlined for new developments which aim to foster safe, healthy, and active lifestyles, are in line with our priorities within our Healthy Environments and Healthy Behaviours programmes. They also provide practical application of the guidance contained in the NPPF that local authorities should 'enable and support healthy lifestyles, especially where this would address green infrastructure, sports facilities, local shops, access to healthier food, allotments and design layouts that encourage walking and cycling'.</p> <p>The commitment to achieving healthy weight for the population of Newcastle-Under-Lyme is evident through the support of active design principles and restrictions on hot food takeaway businesses. This is positive, given the specific challenges around weight management and obesity in the borough and the subsequent cost to health services.</p> <p>It is clear that Borough Council have acknowledged the health and wellbeing challenges in the Borough, and that they recognise the potential of planning in positive changes to promote good health and wellbeing. The inclusion of health impact assessments as a way for developers to review proposals against a set of health and wellbeing concerns, is particularly welcomed. It is expected that this will have a long term impact through carefully considered developments which ensure that the potential for healthier lifestyles is designed into the landscape, housing, and infrastructure, within the Borough.</p> <p>Policy HOU5 refers particularly to the need of specialist needs housing which is addressing an identified need. However, we particularly welcome references made to building for healthy life made within Policy PSD7. In particular, the requirement for housing developments to build accessible and inclusive homes is an important addition to ensure that homes are built for all who may need them, and to reduce the need for expensive adaptations made for people with physical challenges due to age or disability. It is positive to see this reinforced further in Policy HOU3 which acknowledges that physical accessibility is not just relevant to older people but also to younger people with additional needs.</p> <p>Health and wellbeing within the wider environment where homes are built is also well considered in PSD7 through the requirement to produce a design review at an early stage and the inclusion of active travel and aesthetic considerations and innovative solutions to design that will meet the needs of those that reside in those communities.</p> <p>Public Health and Prevention are also satisfied with the inclusion of blue and green infrastructure, trees and other planting, and the growing and sourcing of local food supplies in Policy CRE1. This is an important addition for climate change but can also have a positive impact on physical and mental health. It is also more thoroughly thought through in Open Space, Sports and Leisure Provision (Policy SE6) with particular reference to restricting the loss of open spaces. This supports our priority to increase physical activity and supports the understanding that open spaces have a positive impact on mental health. The inclusion of Policy SE14, Green and Blue Infrastructure, is very well considered for this purpose.</p> <p>Policy RET3 expands on earlier references made to hot food takeaways. Public Health and Prevention particularly endorse the requirement to restrict hot food takeaways close to schools, and for a health impact assessment to be undertaken by the applicant for any proposals to open a hot food takeaway. This is due to the higher-than-average levels of overweight and obese children and adults in the NUL area, and the subsequent health consequences as outlined in the policy.</p> <p>References made to promotion of active travel in the town centre (Policy RET4), within Transport and Accessibility (Policy IN2) and Cycleways, Bridleways and Public Rights of Way (Policy IN4) support our Public Health priority to increase physical activity.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1070
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	SE4
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy SE4: Sustainable drainage Systems – Point 3 (b) – currently reads:</p> <p>Design SuDS solutions appropriate to the scale and nature of the development, following the surface water hierarchy and prioritising infiltration.</p> <p>The LLFA's experience of reviewing sustainable drainage systems submitted under planning applications within the Borough is that they often lack features to provide water treatment, particularly when discharging into a neighbouring watercourse. Most developers will argue that as they are discharging into a sewer then additional treatment is not necessary, however, it is worth noting that the surface water sewerage system will always discharge to a watercourse somewhere so the provision of a management train of features to improve water quality is key design requirement. Above ground conveyance (swales) and attenuation features (basins) not only provide water treatment benefits but also bring amenity and biodiversity benefits and will often aid in the developer achieving a Nett Gain of 10% required under Biodiversity Net Gain requirements. As such, we believe that Policy should seek to prioritise the use of above ground SuDS features to boost water treatment, amenity and biodiversity wherever possible.</p>
<b>Q7 Modification</b>	Suggested re-wording to Point 3 (b): Design SuDS solutions which prioritise infiltration in line with the surface water drainage hierarchy and which are appropriate to the scale and nature of the development. Where possible, surface water should be managed at source and above ground conveyance (swales) and attenuation features (e.g. tanks) to provide a SuDS management chain to provide water treatment, amenity and biodiversity benefits in line with the CIRIA SuDS Manual
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1097
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Section 6 sets out the Local Plan provisions for Climate Change and Renewable Energy, included in Policies CRE1 and CRE2. Both Policies are supported as are the broader objectives in the Plan to mitigate against and adapt to climate change.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1101
<b>Order</b>	10
<b>Title</b>	Current Development Plan
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph

<b>Q4 Paragraph number</b>	2.10
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Paragraph 2.10 includes the reference to the Staffordshire County Council Minerals Local Plan (2015-2030) and Staffordshire and Stoke on Trent Waste Local Plan (adopted 2003) as statutory Development Plan. It is necessary for it to be made clear that both of these plans are due to be reviewed during Newcastle Borough Council's plan period</p>
<b>Q7 Modification</b>	<p>The "Minerals Local Plan (2015 – 2030)" is titled the "<b>Minerals Local Plan for Staffordshire (2015- 2030)</b>" and was adopted in February 2017.</p> <p>The Staffordshire and Stoke on Trent Waste Local Plan (2010 – 2026) was adopted in March 2013.</p> <p>The Borough Council should be aware that both plans are due to be reviewed during the plan period.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1084
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	ED011 Strategic Transport Assessment provides the evidence base for making this allocation. The report indicates there is an unacceptable residual traffic impact on A525 Keele Road.
<b>Q7 Modification</b>	Staffordshire County Council will continue collaborative work using the latest data to identify a full package of measures to ensure the developments are sustainable.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Staffordshire County Council wishes to participate to discuss this issue if it remains unresolved.
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1088
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick

Consultee Given Name	James
Q4 Part of document	Policy
Q4 Policy	Site G&T 8
Q5 Legally compliant	Yes
Q5 Sound	No
Q5 DTC compliant	Yes
Q6 Details	<p>Site G&amp;T 8 (Land West of Silverdale Business Park) is to be located West of Silverdale Business Park.</p> <p>Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the local plan.</p> <p>The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase.</p> <p>In addition, section Site G&amp;T 8, page 140, bullet point 3 has an incorrect spelling,"...No pitches should be occupied before the cessation of the disposal of non-hazardous waste at the <b>Whalley's Quarry Landfill Site...</b>", this should be changed to the correct spelling Walleys Quarry Landfill Site.</p> <p>Non-reactive hazardous waste is allowed until the end of 2026.</p>
Q7 Modification	<p>The Borough Council should be aware that operations at Walleys Quarry landfill site will not cease at the end of 2026. Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states</p> <p>"The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 <b>and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</b> in accordance with the requirements of Condition 37 and 39 below".</p> <p>There is a landfill gas utilisation compound on the south-east extend of the landfill (the latest planning permission for the gas compound was granted in October 2013 ref. N.13/04/216 MW. Condition 16 states:</p> <p>"When the gas utilisation plant is no longer required for the generation of electricity from landfill gas within the landfill site, all buildings, plant, machinery and foundations shall be removed from the Site and the land restored in accordance with the final restoration scheme which is required by Condition 35 of planning permission IDO/N/1 or any subsequent Restoration and Aftercare Scheme as has previously been approved in writing by the Mineral Planning Authority".</p> <p>Additional text should be added concerning the following:</p> <p>The Newcastle under Lyme Borough Council Environmental Health Team and the Environment Agency should be satisfied there would be no unacceptable risks from pollution (e.g. dust, odour, noise and light) to any occupants of the housing development as a result of the proximity to the neighbouring waste management facility; and the housing development would not constrain the continued operation of the neighbouring waste management facility (Walleys Quarry landfill site).</p> <p>In addition, Policy Site G&amp;T 8, on page140, bullet point 3 has an incorrect spelling,"...No pitches should be occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site...", this should be changed to the correct spelling for Walleys Quarry Landfill Site.</p>
Q8 Hearing attendance	No, I do not wish to participate in hearing session(s)
Q10 File 1	6390611
Q10 File 2	6390634
Attachments	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
Comment ID	NULLP1092
Order	88
Title	Policy IN2: Transport and Accessibility
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q4 Part of document	Policy
Q4 Policy	IN2
Q5 Legally compliant	Yes
Q5 Sound	No
Q5 DTC compliant	Yes
Q6 Details	Policy IN2 is generally supported. However, there is need for some amendment to ensure consistency of approach and references to the relevant Transport policy and strategy documents of the County Council.

	<p>IN2 Policy part 8 state that 'Development should take account of the Local Transport Plan and Bus Service Improvement Plan.' This part of the Policy should also include reference to the Local cycling and Walking Infrastructure Plan and Borough Integrated Transport Strategy.</p> <p>In the supporting information section bullet points 10.13 and 10.16 both refer to the LTP, which leads to duplication and potential confusion. We suggest these are merged and replaced with the text in part 7 below to aid interpretation of the Policy.</p>
<b>Q7 Modification</b>	<p>Policy IN2 part 8 should be amended to read:</p> <p>'8. Development should take account of the Local Transport Plan and associated documents including the Borough Integrated Transport Strategy, Bus Service Improvement Plan and Local cycling and Walking Infrastructure Plan.'</p> <p>In the Supporting Information paragraphs 10.13 and 10.16 should be combined into the following to avoid duplication and misinterpretation:</p> <p>'The Local Transport Plan, prepared by the County Council provides for an important reference guide to how the highway authority will respond to planning applications. The Local Transport Plan and associated documents should be considered in the development of any planning application. The most up to date iteration of the Infrastructure Delivery Plan will also be a significant determinant in establishing appropriate mitigation requirements.'</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1096
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Section 6 sets out the Local Plan provisions for Climate Change and Renewable Energy, included in Policies CRE1 and CRE2. Both Policies are supported as are the broader objectives in the Plan to mitigate against and adapt to climate change.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1100
<b>Order</b>	180
<b>Title</b>	Policy KS3 Land at Blackbank Road, Knutton
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	The site is located with 50 metres of Knutton Quarry and in a Minerals Safeguarding Area.

<b>Q7 Modification</b>	The following text should be added to the policy to be consistent with other sites in Mineral Safeguarding Areas:  'A Minerals Safeguarding Area assessment being prepared and submitted for the site'.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1104
<b>Order</b>	210
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.187
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please read in conjunction with our comments on Policy SP23.</p> <p>The text in paragraph 13.187 conflicts with that in Policy SP23, which sets out <i>'No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026'</i></p> <p>Whereas paragraph 13.187 states <i>'No dwellings on site should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027'</i></p> <p>As previously noted Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states: "The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042 "</p>
<b>Q7 Modification</b>	Paragraph 13.187 should be amended such that it reflects the text in the Policy regards restrictions on occupations
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1083
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	ED011 Strategic Transport Assessment provides the evidence base for making this allocation. The report indicates there is an unacceptable residual traffic impact on A525 Keele Road.



<b>Q7 Modification</b>	Staffordshire County Council will continue collaborative work using the latest data to identify a full package of measures to ensure the developments are sustainable.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Staffordshire County Council wishes to participate to discuss this issue if it remains unresolved.
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1087
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy IN1 is supported.</p> <p>The policy includes reference to the delivery schedule included in The Infrastructure Delivery Plan, which contains a comprehensive list of Infrastructure requirements.</p> <p>We note the inclusion of the requirement for all residential sites to provide an education contribution as requested by Staffordshire County Council where appropriate. We have worked closely with NBC to ensure the forward planning of future education infrastructure within the Local Plan.</p> <p>We support reference in IN1 to Land at Madeley High School being allocated in order for the future growth of the school through developer contributions. We have commented elsewhere regards this allocation needing to appear in the list of land removed from the Green Belt.</p> <p>Part 13 (b) of the Policy sets out improvements the Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill), which is identified in the Strategic Transport Assessment as necessary to mitigate the cumulative impact of development traffic. Staffordshire County Council will work collaboratively to forecast the future operation of the junction with the Local Plan allocations in place as per the recommendation in the Strategic Transport Assessment.</p> <p>The improvement scheme will require the incorporation of land (green space) under Newcastle Borough Council ownership being brought into the highway. This point is not made clear in the Plan. Therefore, it is suggested that additional text be added to the supporting information to ensure this requirement is understood.</p> <p>We acknowledge and support the Policy requirements for developer contributions towards the Talke Signals improvement in Policies BL8, BL18, BL32, TK6, TK10, TK17 and TK27</p>
<b>Q7 Modification</b>	<p>To strengthen the Local Plan and our joint position it would be beneficial to include reference to the Staffordshire Education Infrastructure contributions Policy (SEICP) to the Newcastle Borough Local Plan in the supporting text to policy IN1. The SEICP was widely consulted on and sets out the approach to identifying the impact of new residential development on education infrastructure and the likely mitigation to make developments acceptable in planning terms.</p> <p>As noted above a further change is required to the supporting text to clarify the requirements for the delivery of the infrastructure scheme listed at 13(b). It is requested that the following be added to the end of paragraph 10.3:</p> <p>'The highway scheme listed at IN1 - 13(b) will require part of the existing green space (Thomas Street Open Space) fronting the A34 to be brought into the highway to facilitate delivery of the improvement set out in the Strategic Transport Assessment.'</p>

<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1091
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy EMP 1 is supported.</p> <p>Bullet point 5 sets out requirements for the provision of Employment and Skills Plans. This is supported as it will assist local residents into employment and/or skills provision. Employment and Skills Plans have the potential to increase the pool of potentially suitable employees in the vicinity of employment allocations, which can also assist in reducing journey to work distances and highway impact.</p> <p>The County Council has worked with partners to prepare the Staffordshire Employment and Skills Plan Framework, which is listed at Paragraph 8.7. The framework sets out an agreed approach across Staffordshire towards the production and implementation of Employment and Skills Plans with new development across the County.</p> <p>We also support specific reference to Employment and Skills Plans withing Policy AB2</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1095
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Whilst we are supportive of the general principles of Policy SE6 it fails to recognise the required loss of Open Space for the improvement scheme identified at the signalised junction at Newcastle Road/Coalpit Hill. Delivery of the improvement could therefore be hampered by the policy and it is therefore suggested that amendment is required to part 4 as set out below. This will ensure the essential infrastructure improvement can go ahead. The improvement scheme requires the extension of the north west-bound Newcastle Road two-lane approach to the signalised junction to give additional space for right-turning traffic. Therefore the land required from the open space will be a narrow linear strip that will not affect the overall usability of the open space</p>
<b>Q7 Modification</b>	<p>Add in a new 4 d. stating:</p> <p>Proposals which result in the loss of green /open space, sports and recreational buildings and land will only be permitted where:</p>

	'd. land is required for the delivery of infrastructure schemes identified in the IDP.'
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1099
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy SA1 is generally supported, it sets out the general requirements for new development proposals comprehensively and signposts to other policy requirements.</p> <p>However, a minor change to Table 6 (Site Allocation Requirements) is required in relation to Minerals and reference to Policy 3 of the Staffordshire Mineral Plan – see below.</p>
<b>Q7 Modification</b>	The Borough Council should be aware that the Minerals Local Plan for Staffordshire (2015-2030) is due to be reviewed during the plan period and reference to the review should be included in this policy.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1103
<b>Order</b>	230
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.235
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please read in conjunction with our comments on Policy TB6.</p> <p>The text in paragraph 13.235 conflicts with that in Policy TB6, which sets outs '<i>No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026</i>'</p> <p>Whereas paragraph 13.235 states '<i>No dwellings on site should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027</i>'.</p> <p>As previously noted Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states: "The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042 "</p>

<b>Q7 Modification</b>	Paragraph 13.235 should be amended such that it reflects the text in the Policy regards restrictions on occupations.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1107
<b>Order</b>	229
<b>Title</b>	Policy TB6 Former Pool Dam Pub site, Orme Road, Poolfields, Newcastle
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Site TB6 (Former Pool Dam Pub Site, Orme Road, Poolfields, Newcastle) lies east of Walleys Quarry and landfill and is allocated for 13 dwellings.</p> <p>Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the local plan.</p> <p>The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase.</p> <p>In addition, Policy TB6 page 148, bullet point 2, “<i>No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the <b>Whalley’s Quarry Landfill Site...</b></i>”, this should be changed to the correct spelling Walleys Quarry Landfill Site.</p> <p>Non-reactive hazardous waste is allowed until 2026.</p>
<b>Q7 Modification</b>	<p>The Borough Council should be aware that operations at Walleys Quarry landfill site will not cease at the end of 2026. Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states</p> <p>“The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 <b>and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</b> in accordance with the requirements of Condition 37 and 39 below”.</p> <p>There is a landfill gas utilisation compound on the south-east extend of the landfill (the latest planning permission for the gas compound was granted in October 2013 ref. N.13/04/216 MW. Condition 16 states:</p> <p>“When the gas utilisation plant is no longer required for the generation of electricity from landfill gas within the landfill site, all buildings, plant, machinery and foundations shall be removed from the Site and the land restored in accordance with the final restoration scheme which is required by Condition 35 of planning permission IDO/N/1 or any subsequent Restoration and Aftercare Scheme as has previously been approved in writing by the Mineral Planning Authority”.</p> <p>Additional text should be added concerning the following:</p> <p>The Newcastle under Lyme Borough Council Environmental Health Team and the Environment Agency should be satisfied there would be no unacceptable risks from pollution (e.g. dust, odour, noise and light) to any occupants of the housing development as a result of the proximity to the neighbouring waste management facility; and the housing development would not constrain the continued operation of the neighbouring waste management facility (Walleys Quarry landfill site).</p> <p>In addition, Policy TB6 on page 148, bullet point 2 states “<i>No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the <b>Whalley’s Quarry Landfill Site...</b></i>”, this should be changed to the correct spelling for Walleys Quarry Landfill Site.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1108

Order	233
Title	Policy TB23 Land West of Galingale View, Thistleberry
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q4 Part of document	Policy
Q4 Policy	TB23
Q5 Legally compliant	Yes
Q5 Sound	No
Q5 DTC compliant	Yes
Q6 Details	<p>Site TB23 (Land West of Galingale View, Thistleberry) lies east of Walleys Quarry and Landfill and is allocated for 124 houses on 4.365 ha of land.</p> <p>Walleys Quarry landfill site is an operational landfill site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the local plan.</p> <p>The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase.</p> <p>In addition, Section TB23 page 151, bullet point 2. has an incorrect spelling, ‘...waste at the <b>Whalley's Quarry Landfill Site...</b>’, this should be changed to the correct spelling Walleys Quarry Landfill Site.</p> <p>Non-reactive hazardous waste is allowed until the end of 2026.</p>
Q7 Modification	<p>The Borough Council should be aware that operations at Walleys Quarry landfill site will not cease at the end of 2026. Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states</p> <p>“The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 <b>and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</b> in accordance with the requirements of Condition 37 and 39 below”.</p> <p>There is a landfill gas utilisation compound on the south-east extend of the landfill (the latest planning permission for the gas compound was granted in October 2013 ref. N.13/04/216 MW. Condition 16 states:</p> <p>“When the gas utilisation plant is no longer required for the generation of electricity from landfill gas within the landfill site, all buildings, plant, machinery and foundations shall be removed from the Site and the land restored in accordance with the final restoration scheme which is required by Condition 35 of planning permission IDO/N/1 or any subsequent Restoration and Aftercare Scheme as has previously been approved in writing by the Mineral Planning Authority”.</p> <p>Additional text should be added concerning the following:</p> <p>The Newcastle under Lyme Borough Council Environmental Health Team and the Environment Agency should be satisfied there would be no unacceptable risks from pollution (e.g. dust, odour, noise and light) to any occupants of the housing development as a result of the proximity to the neighbouring waste management facility; and the housing development would not constrain the continued operation of the neighbouring waste management facility (Walleys Quarry landfill site).</p> <p>In addition, Policy TB23 on page 151, bullet point 2. has an incorrect spelling, ‘...waste at the <b>Whalley's Quarry Landfill Site...</b>’, this should be changed to the correct spelling for Walleys Quarry Landfill Site.</p>
Q8 Hearing attendance	No, I do not wish to participate in hearing session(s)
Q10 File 1	6390634
Q10 File 2	6390634
Attachments	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
Comment ID	NULLP1077
Order	117
Title	Policy SE9: Historic Environment
Consultee Company / Organisation	Staffordshire County Council
Consultee Family Name	Chadwick
Consultee Given Name	James
Q4 Part of document	Policy
Q4 Policy	SE9
Q5 Legally compliant	Yes
Q5 Sound	Yes

<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>4.16 We certainly welcome the inclusion of Strategic Objective SO-13 (XX). Inclusion of a specific Strategic Objective for the historic environment is important as it ensures that the foundations are laid for a positive strategy for the historic environment, as required by Par 196 of the NPPF (2023).</p> <p>Policy SE9: Historic Environment – The inclusion, and comprehensive nature, of this policy is welcome, and it sets out a positive strategy for the historic environment in the borough. There is a clear outline provided of what is required where development has the potential impact on the historic environment and the numerous references to the various studies and reports that make up the historic environment baseline for the borough is particularly useful. The inclusion of a specific clause covering below ground archaeology is supported, as is the information and emphasis provided on historic farmsteads (including the design code outlined in Appendix 5). Specific reference to proposals being favourably considered for named buildings on the Heritage At Risk Register is to be commended, so long as the proposals do not impact on the significance of these designated heritage assets. Likewise with visitor/tourism related infrastructure that better reveals the Registered Battlefield and Scheduled Monuments in the borough.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1082
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>4.16 We certainly welcome the inclusion of Strategic Objective SO-13 (XX). Inclusion of a specific Strategic Objective for the historic environment is important as it ensures that the foundations are laid for a positive strategy for the historic environment, as required by Par 196 of the NPPF (2023).</p> <p>Policy SE9: Historic Environment – The inclusion, and comprehensive nature, of this policy is welcome, and it sets out a positive strategy for the historic environment in the borough. There is a clear outline provided of what is required where development has the potential impact on the historic environment and the numerous references to the various studies and reports that make up the historic environment baseline for the borough is particularly useful. The inclusion of a specific clause covering below ground archaeology is supported, as is the information and emphasis provided on historic farmsteads (including the design code outlined in Appendix 5). Specific reference to proposals being favourably considered for named buildings on the Heritage At Risk Register is to be commended, so long as the proposals do not impact on the significance of these designated heritage assets. Likewise with visitor/tourism related infrastructure that better reveals the Registered Battlefield and Scheduled Monuments in the borough.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1086
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James



<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	4a does not explicitly reference the need for the development to consider connectivity by public transport.
<b>Q7 Modification</b>	<p>Suggested revised policy wording:</p> <p>Consider sustainable travel links including public transport provision and cycle and pedestrian connectivity. Development should also consider walking and active travel for health and wellbeing purposes within the site.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Staffordshire County Council wishes to participate to discuss this issue if it remains unresolved.
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1090
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Site SP23 (Land at Cemetery Road/Park Road) lies Southwest of Walleys Quarry and Landfill, the site is allocated for 200 dwellings on a plot of land measuring 10.675 ha.</p> <p>Walleys Quarry landfill site is an operational site which has permission for landfilling until 2042. It is likely that operations will continue at the site throughout the duration of the local plan.</p> <p>The landfill gas utilisation plant, leachate control and monitoring equipment, and the groundwater monitoring equipment would be required during the restoration and aftercare phase.</p> <p>In addition, Policy SP23, page 138, bullet point 3 has an incorrect spelling, '<i>...non-hazardous waste at the <b>Whalley's Quarry Landfill Site</b>...</i>', this should be changed to the correct spelling, Walleys Quarry Landfill Site.</p> <p>Throughout, Newcastle Under Lyme Local Plan, the cessation of works at Walleys Quarry Landfill Site for non-hazardous waste is quoted as 2026 but later it is stated that the "Walleys Quarry as a landfill site has ceased which is anticipated in 2027". This is not consistent throughout the plan.</p> <p>Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states:</p> <p>"The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042 in accordance with the requirements of Condition 37 and 39 below".</p>
<b>Q7 Modification</b>	<p>he Borough Council should be aware that operations at Walleys Quarry landfill site will not cease at the end of 2026. Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states</p> <p>"The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 <b>and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</b> in accordance with the requirements of Condition 37 and 39 below".</p>

	<p>There is a landfill gas utilisation compound on the south-east extend of the landfill (the latest planning permission for the gas compound was granted in October 2013 ref. N.13/04/216 MW. Condition 16 states:</p> <p>“When the gas utilisation plant is no longer required for the generation of electricity from landfill gas within the landfill site, all buildings, plant, machinery and foundations shall be removed from the Site and the land restored in accordance with the final restoration scheme which is required by Condition 35 of planning permission IDO/N/1 or any subsequent Restoration and Aftercare Scheme as has previously been approved in writing by the Mineral Planning Authority”.</p> <p>Additional text should be added concerning the following:</p> <p>The Newcastle under Lyme Borough Council Environmental Health Team and the Environment Agency should be satisfied there would be no unacceptable risks from pollution (e.g. dust, odour, noise and light) to any occupants of the housing development as a result of the proximity to the neighbouring waste management facility; and the housing development would not constrain the continued operation of the neighbouring waste management facility (Walleys Quarry landfill site).</p> <p>In addition, Policy SP23, page 138, bullet point 3 has an incorrect spelling, “...no dwellings will be occupied before the cessation of the disposal of non-hazardous waste at the <i>Whalley's Quarry Landfill site,...</i>”, this should be changed to the correct spelling for Walleys Quarry Landfill Site</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1094
<b>Order</b>	119
<b>Title</b>	Policy SE10: Landscape
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE10
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The policy recognises the importance of landscape character and sets out requirements which development proposals must address. This policy is supported.</p> <p>Part 2 of the Policy sets out when a Landscape and Visual impact Assessment (LVIA) is required. However, there is little detail on how an LVIA should be prepared. It is usually recommended that it should be prepared in accordance with the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment' 3rd Edition (GLVIA3) 2013, or subsequent updates, to ensure suitable methodology is used to address all relevant landscape issues.</p>
<b>Q7 Modification</b>	It is suggested that paragraph 11.58 is amended to include the following as a final sentence – ‘Where a LVIA is to be completed it should be prepared in accordance with the Landscape Institute's ‘Guidelines for Landscape and Visual Impact Assessment’ 3rd Edition (GLVIA3) 2013, or subsequent updates.’
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1098
<b>Order</b>	49
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.192

<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please read in conjunction with our comments on Policy G&amp;T8.</p> <p>The text in paragraph 13.192 conflicts with that in Policy G&amp;T8, which sets out 'No pitches should be occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026</p> <p>Whereas paragraph 13.192 states 'No pitches on site should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027..'</p> <p>As previously noted Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states: "The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042 "</p>
<b>Q7 Modification</b>	Paragraph 13.192 should be amended such that it reflects the text in the Policy regards restrictions on occupations.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1102
<b>Order</b>	234
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.260
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please read in conjunction with our comments on Policy TB23.</p> <p>The text in paragraph 13.260 is incomplete and conflicts with that in Policy TB23, which sets out 'No dwellings being occupied before the cessation of the disposal of non-hazardous waste at the Whalley's Quarry Landfill Site, currently anticipated December 2026'</p> <p>Whereas paragraph 13.260 states 'Dwellings will not be occupied until the operation of Walleys Quarry as a landfill site.' The sentence is incomplete but we assume it would follow the pattern we have commented on for other allocations close to the quarry.</p> <p>As previously noted Condition 2 of planning permission N.12/09/216 MW dated 26 May 2016 states: "The landfilling of non-hazardous waste and stable non-reactive hazardous wastes shall cease no later than 31 December 2026 and thereafter landfilling shall continue only with inert waste, such that the site is restored no later than 21 February 2042</p>
<b>Q7 Modification</b>	Paragraph 13.260 needs to be corrected such that the sentence relating to the restriction on occupations is complete and aligns with the text in the Policy
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>
<b>Comment ID</b>	NULLP1106

<b>Order</b>	206
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Family Name</b>	Chadwick
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.177
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please read in conjunction with our comments on Policy SP11</p> <p>Paragraph 13.177 seems to conflict with the Policy. The Policy restricts occupation of dwellings to the date at which import of non-hazardous waste to Walleys Quarry landfill ceases. Whereas the text in paragraph 13.177 states '<i>No dwellings on parcel 4 on Park Road should be occupied until the operation of Walleys Quarry as a landfill site has ceased which is anticipated in 2027</i>'. As set out in our comments on the Policy the end date for operations as a landfill is 2042.</p>
<b>Q7 Modification</b>	Paragraph 13.177 should be amended such that it reflects the text in the Policy regards restrictions on occupations.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6390611
<b>Q10 File 2</b>	6390634
<b>Attachments</b>	<a href="#">1307641 James Chadwick.pdf</a> <a href="#">1307641 James Chadwick.pdf</a>

<b>Comment ID</b>	NULLP13
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Challinor
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11 (3)
<b>Q6 Details</b>	<p><b>Subject: Local Plan 2020-2040 SP11 (3)</b></p> <p>The below represent my comments in relation to SP11 (3) contained within the Draft Local Plan 2020-2040</p> <ol style="list-style-type: none"> <li>1 The density of the properties seems very high given the size of the land detailed/allocated within SP11 (3)</li> <li>2 Access via Ashbourne Drive/Staveley Place is less than desirable given that Staveley Place is effectively reduced to a single width road due to residents parking on the road. Likely to be in excess of an additional 800 vehicular movements per day from this specific development proposal. High St/Mill St (access road to Ashbourne Drive/Staveley Place) has traffic calming measures on their whole length between its junctions with the B5044. In most places vehicular movements are slowed by restricted carriageway widths due to residents parking their cars on the road. Church St/Newcastle St (B5044) (an alternative access route to Ashbourne Drive) is similarly affected by cars parking on both sides of the road which significantly restricts carriageway widths.</li> <li>3 The development on the former Silverdale Colliery site has seen a significant increase in traffic on High St/Mill St and Church St/Newcastle St (B5044) and we are yet to see the impact the new development on Pepper St will have on local traffic.</li> </ol> <p>My main objection is the additional traffic and its impact on the current local roads described above. There is also planning permission for an additional 4 detached properties at the rear of the Bush public house- accessed via Ashbourne Drive. Noting the need for residential properties within the area would it not be possible to combine SP(1) SP(2) and SP11(3) into a linear development with access via the A525 or provide an uprated/revised link road between SP11(2) and SP11(3) to negate the need to use Ashbourne Drive/Staveley Place for access purposes.</p> <p>(Redacted by admin)</p>

<b>Comment ID</b>	NULLP607
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Chatfield
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Policy AB2</p> <p>The proposal for this employment site is unsound</p> <p>They are proposing to take 198 acres of good quality agricultural land in the green belt - it will be from Junction 16 at the top, all the way down to Moat Lane at the bottom and is bordered by Park Lane. Massive!</p> <p>Potentially employing 3000 people all having to travel in. They are proposing a bus route and cycle tracks but where are all these people going to come from, maybe Stoke or Newcastle but possibly, Manchester, Crewe &amp; Birmingham. Can you really see 3000 people travelling on a bus or cycling to work which will mean long journey times and plenty of hills to navigate – and then along comes winter with rain, snow and freezing temperatures - it just isn't realistic is it?</p> <p>Not only are our roads going to face potentially a further 3000 cars but the site plan includes a lorry park for 100 HGVs and then there will be all the HGVs delivering to the one million square foot warehouse/33 ft high warehouse they want to build and not forgetting all the service vehicles that will service the site.</p> <p>Clearly with Increased congestion on the M6 and A500 and we all know what happens if there is an incident on either of these roads, it results in increased traffic through our villages trying to get on to the A34.</p> <p>There will also be two "emergency" exits – one on Park Lane and one on Barthomley Road – these are single track, country lanes without footpaths. How are they going to prevent employees using these exits as a short cut rather than queuing up to go to work on the A500?</p> <p>If carbon capture is part of this government's plan, then planting more trees, close to a busy motorway is the way to go.</p> <p>I request removal of AB2 from the local plan.</p>



<b>Comment ID</b>	NULLP1052
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Churchill Living
<b>Consultee Family Name</b>	Churchill Living
<b>Agent Company / Organisation</b>	Planning Issues
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Lynch
<b>Agent Given Name</b>	Damien
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy HOU3: Housing Standards and HOU5 Specialist Housing</p> <p>In relation to specialist housing for older people the policy requires 10% of market dwellings to meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard.</p> <p>Again, this is not justified through testing in the plan wide viability study and even without the costs of meeting these requirements, specialist housing for older people is found within the council's study to be unviable.</p> <p>There is no viability evidence base underpinning such a requirement.</p> <p>Experience has shown that even where local authorities do test the viability of this requirement, they fail to test the implications of building larger flats and larger communal areas to achieve the desired standard. This is the case here also.</p> <p>It is common for Local Authorities to confuse the needs of 'wheelchair users' with the needs of older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons housing and particularly extra care housing. Older people's housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.</p> <p>The PPG establishes that in order for a plan to introduce policy requirements such as the above, an assessment of the financial viability of doing so should be undertaken (in general with no exceptions highlighted). The PPG sets out the following pertinent points in this regard:</p> <p>How should plan makers set policy requirements for contributions from development?</p> <p>Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.</p> <p>See related policy: National Planning Policy Framework paragraph 34</p> <p>Paragraph: 001 Reference ID: 10-001-20190509</p> <p>Revision date: 09 05 2019 See previous version</p> <p>What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?</p> <p>Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</p> <ul style="list-style-type: none"> <li>• the likely future need for housing for older and disabled people (including wheelchair user dwellings).</li> <li>• size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).</li> <li>• the accessibility and adaptability of existing housing stock.</li> <li>• how needs vary across different housing tenures.</li> <li>• the overall impact on viability.</li> </ul> <p>How should local planning authorities establish a clear need?</p> <p>It will be for a local planning authority to establish a clear need based on:</p> <ul style="list-style-type: none"> <li>• existing sources of evidence.</li> </ul>

	<ul style="list-style-type: none"> <li>• consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance</li> <li>• consideration of the impact on viability and housing supply of such a requirement.</li> </ul> <p>Paragraph: 015 Reference ID: 56-015-20150327</p> <p>Revision date: 27 03 2015</p> <p>Should plan-making bodies set minimum requirements for accessible housing?</p> <p>Where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:</p> <p>M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)</p> <p>M4(2) Category 2: Accessible and adaptable dwellings</p> <p>M4(3) Category 3: Wheelchair user dwellings</p> <p>Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors.</p> <p>Paragraph: 009 Reference ID: 63-009-20190626</p> <p>Revision date: 26 June 2019</p> <p>National policy and guidance are clear that the inclusion of minimum accessibility requirements must only be done so following a consideration of viability. Not all of the appraisals undertaken are provided within the plan wide study but the conclusions in respect of specialist housing for older people are quite clear. It is unviable to load design and sustainability requirements on these typologies.</p> <p>In this case the council does not have the viability evidence base to support the inclusion of the M4(3) requirement and should be deleted as it is not justified to include this requirement.</p>
<b>Q7 Modification</b>	Recommendation –the requirement to provide 10% of dwellings to M4(3) standard on older persons housing developments should be removed from both Policy HOU3 and Policy HOU5.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	It is important that the policy is discussed with those parties who will be involved in delivering the housing impacted by the proposed policies to understand the issues which are likely to arise.
<b>Comment ID</b>	NULLP1050
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Churchill Living
<b>Consultee Family Name</b>	Churchill Living
<b>Agent Company / Organisation</b>	Planning Issues
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Lynch
<b>Agent Given Name</b>	Damien
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy HOU 1 affordable Housing</p> <p>Draft Policy HOU1 on affordable housing matters seeks to apply a generic affordable housing requirement as follows (on sites proposing 10 dwellings or more):</p> <ol style="list-style-type: none"> <li>30% of all units on greenfield sites.</li> <li>15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.</li> <li>25% of units on brownfield sites within the 'high value zone' as shown on the policies map.</li> </ol> <p>The Supporting Information to the policy at Paragraph 7.9 confirms that 'proposals for extra care accommodation, assisted living or other forms of retirement housing to be let and sold on the open market will be subject to the requirements of this policy to provide affordable housing'</p> <p>However, the council do not have a justified policy basis to apply the affordable housing requirements to housing for older people. The Local Plan evidence base (by Porter Planning Economics) included testing of the viability of housing for older people where it is concluded that:</p> <p>...It is clear from these results that the older person accommodation would be unlikely to come forward under the emerging Local Plan and current residential market. The testing shows that even by varying the affordable rate, the current residential market is unable to afford to deliver any affordable housing based on standard market conditions in the older persons accommodation sector'.</p> <p>The PPG states</p> <p>'policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as a single figure</p>

	<p>rather than a range. Different requirements may be set for different types or location of site or types of development.'</p> <p>It is clear from the council's viability testing that there is no viable range given that none of the testing demonstrates a viable position.</p> <p>The PPG also states that the role for viability assessment is primarily at the plan making stage . By gnoring the plan wide viability assessment, the opposite is achieved in that housing for older people developments would be forced down the uncertainty of site-specific viability negotiation. The PPG is also clear that in respect of site-specific viability, reference should be taken from the plan wide viability study. An unnecessary circular position therefore arises.</p> <p>The requirement for older persons housing to provide affordable housing should be removed from the policy as it is not justified or consistent with national policy. Such an approach with be consistent with recent local plan adoptions (Fareham and Maidstone) and consultation proposals at BCP, Birmingham and Charnwood whereby full exemptions are either adopted or proposed in view of the plan wide viability study conclusions.</p>
<b>Q7 Modification</b>	Recommendation - Policy HOU1 is not justified and it should be stated within the policy that the affordable housing targets will not be applied to specialist housing for older people.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	It is important that the policy is discussed with those parties who will be involved in delivering the housing impacted by the proposed policies to understand the issues which are likley to arise.
<b>Comment ID</b>	NULLP1054
<b>Order</b>	50
<b>Title</b>	Policy HOU5: Specialist Needs Housing
<b>Consultee Company / Organisation</b>	Churchill Living
<b>Consultee Family Name</b>	Churchill Living
<b>Agent Company / Organisation</b>	Planning Issues
<b>Agent Position</b>	Associate Director
<b>Agent Family Name</b>	Lynch
<b>Agent Given Name</b>	Damien
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy HOU3: Housing Standards and HOU5 Specialist Housing</p> <p>In relation to specialist housing for older people the policy requires 10% of market dwellings to meet the requirements of Building Regulations Part M4 (3) (2) A wheelchair adaptable homes standard.</p> <p>Again, this is not justified through testing in the plan wide viability study and even without the costs of meeting these requirements, specialist housing for older people is found within the council's study to be unviable.</p> <p>There is no viability evidence base underpinning such a requirement.</p> <p>Experience has shown that even where local authorities do test the viability of this requirement, they fail to test the implications of building larger flats and larger communal areas to achieve the desired standard. This is the case here also.</p> <p>It is common for Local Authorities to confuse the needs of 'wheelchair users' with the needs of older people in the community. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable and accessible housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older person's scheme reducing independence contrary to the ethos of older persons housing and particularly extra care housing. Older people's housing should therefore be incorporated into the emerging Local Plan separately to adaptable and accessible housing and not confused with it.</p> <p>The PPG establishes that in order for a plan to introduce policy requirements such as the above, an assessment of the financial viability of doing so should be undertaken (in general with no exceptions highlighted). The PPG sets out the following pertinent points in this regard:</p> <p>How should plan makers set policy requirements for contributions from development?</p> <p>Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).</p> <p>These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community nfrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as</p>

	<p>a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.</p> <p>See related policy: National Planning Policy Framework paragraph 34</p> <p>Paragraph: 001 Reference ID: 10-001-20190509</p> <p>Revision date: 09 05 2019 See previous version</p> <p>What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?</p> <p>Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:</p> <ul style="list-style-type: none"> <li>• the likely future need for housing for older and disabled people (including wheelchair user dwellings).</li> <li>• size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).</li> <li>• the accessibility and adaptability of existing housing stock.</li> <li>• how needs vary across different housing tenures.</li> <li>• the overall impact on viability.</li> </ul> <p>How should local planning authorities establish a clear need?</p> <p>It will be for a local planning authority to establish a clear need based on:</p> <ul style="list-style-type: none"> <li>• existing sources of evidence.</li> <li>• consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance</li> <li>• consideration of the impact on viability and housing supply of such a requirement.</li> </ul> <p>Paragraph: 015 Reference ID: 56-015-20150327</p> <p>Revision date: 27 03 2015</p> <p>Should plan-making bodies set minimum requirements for accessible housing?</p> <p>Where an identified need exists, plans are expected to make use of the optional technical housing standards (footnote 46 of the National Planning Policy Framework) to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:</p> <p>M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)</p> <p>M4(2) Category 2: Accessible and adaptable dwellings</p> <p>M4(3) Category 3: Wheelchair user dwellings</p> <p>Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors.</p> <p>Paragraph: 009 Reference ID: 63-009-20190626</p> <p>Revision date: 26 June 2019</p> <p>National policy and guidance are clear that the inclusion of minimum accessibility requirements must only be done so following a consideration of viability. Not all of the appraisals undertaken are provided within the plan wide study but the conclusions in respect of specialist housing for older people are quite clear. It is unviable to load design and sustainability requirements on these typologies.</p> <p>In this case the council does not have the viability evidence base to support the inclusion of the M4(3) requirement and should be deleted as it is not justified to include this requirement.</p>
<b>Q7 Modification</b>	Recommendation –the requirement to provide 10% of dwellings to M4(3) standard on older persons housing developments should be removed from both Policy HOU3 and Policy HOU5.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	It is important that the policy is discussed with those parties who will be involved in delivering the housing impacted by the proposed policies to understand the issues which are likley to arise.

<b>Comment ID</b>	NULLP101
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Clarke
<b>Consultee Given Name</b>	Jonathan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I am taking this opportunity to voice my concerns, as I feel this build will impact this company more than any other in the surrounding area. As a company we have traded for nearly 40 years and provide full time employment for 10 people.</p> <p>My main concerns are as follows</p> <ul style="list-style-type: none"> <li>• The lack of communication from yourselves. I have received no letter or email. I found out about the consultation whilst at the barbers on Brunswick Street.</li> <li>• The massive lack of parking for the size of the building. Even if a quarter of the resident's drive there are not enough spaces for everyone. Where are people going to park?</li> <li>• The impact on the busy one way street due to potential rise in traffic and the effect it will have on an already very busy and dangerous junction at the end of North Street. (see attached Road 1)</li> <li>• What are the parking provisions for visitors and people using the units.</li> <li>• The impact the build will have on deliveries and collections from ourselves. (See attachment unloading 2 and unloading.)</li> <li>• Due to size of the 2 way entrance and exit on North Street and the close proximity of the unit fronts, I am struggling to see where my customers can park and load goods on to their vans. (See attachment Parking 1 and 2)</li> <li>• Where are the drains going to run because there are massive problems currently with the drains.</li> <li>• Putting in small unit/business What is the point you can't fill the shops in Newcastle. Where the potential customers going to Park?</li> <li>• York Place development will have new retails and start up units and they are the in the town centre and so the units should be dropped from this application.</li> </ul> <p>I would like to propose a site meeting to discuss my concerns.</p> <p>I would like to be kept informed of any meeting please as I feel this development is far too big and has not been thought out with the businesses and residents of the surrounding area and will have a serious and damaging effect on the local area.</p>
<b>Q10 File 1</b>	6382327
<b>Q10 File 2</b>	6382328
<b>Q10 File 3</b>	6382333
<b>Attachments</b>	<a href="#">1363306 Jonathan Clarke 1.jpg</a> <a href="#">1363306 Jonathan Clarke 2.jpg</a> <a href="#">1363306 Jonathan Clarke 345.pdf</a>

<b>Comment ID</b>	NULLP1109
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Clewes
<b>Consultee Given Name</b>	Martine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>To whom it may concern I wish to lodge the following objections around the Newcastle Under Lyme Local Plan with particular reference to the site allocations in Audley Parish. I feel that these elements of the local plan are not justifiable and are not sound.</p> <p>These are:</p> <p>Site AB12 – Land east of Diglake Street</p> <p>Site AB15 – Land north of Vernon Avenue</p> <p>Site AB 33 land off Nantwich Road/Park Lane, Audley</p> <p>Site AB 2 – Land at junction 16 of the M6, Proposed strategic employment site.</p> <p><b><u>Objections to AB2, Land at J16</u></b></p> <p>This site is four times larger than the council say they need, therefore making this a flawed development at the start. Why take large swathes of green belt land when by the councils' own surveys, they do not need this much warehousing. The council 22 HA of land should be for strategic employment yet are looking to allocate 80HA at AB2. The funding for the conversion of the junction to accommodate this, I believe will need to come from Highways England, and there is no recommendation I can see that says this funding will be available thus making the proposal ineffective and unsound.</p> <p>Whilst the site is convenient to the M6, there no transport hubs in the proximity thus more cars will be travelling in to the proposed site thus increasing pollution in the area that is already high due to the closeness of the M6/A500 which are extremely busy through routes and already have a significant amount of traffic utilising them. When accidents occur, the area becomes congested and dangerous with access and egress points having poor visibility. All the surrounding roads are narrow and will not sustain vehicles of large sizes like vans/lorries etc.</p> <p>The proposed emergency exit for the site will not sustain heavy vehicles and limited width will create more hazard and pollution. The addition of a lorry park due to the removal of a present lay by will again be detrimental to the area and will, at times of heavy flow, deliver more pollutants and health damage to local residents.</p> <p>The proposed bus/cycle routes for I assume, employees on the site, if they are travelling from far afield will not be used and most people will travel by car, again bringing traffic back log and pollutions to the area. With a shift pattern being considered, this would indicate there will be a lot of noise and traffic for 24-hour periods, on a site that is larger than required, a fact that cannot be ignored by the council.</p> <p>There is mention of a local employment and skills plan being prepared, the Audley area as far as I am aware, is not one where unemployment is high so if local people are not going to be working on the site, this would indicate people travelling into the area and aforementioned concerns around this.</p> <p>There will be an increase in all manner of pollutions and an increase in traffic through the village, all for a site that is not needed within the area. There are many outlying sites in both Cheshire East and Stoke on Trent that are more viable and contain much unused warehousing at this time.</p> <p>The proposed size of this site is in itself unjust as it is not needed. Should this site go through it will put even more pressure onto the need for housing in a small village with limited infrastructure.</p> <p>I strongly believe that this site needs to be removed from the local plan as it is not a justifiable development and goes against what the council themselves say is needed for employment in the local area.</p>
<b>Comment ID</b>	NULLP1111
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Clewes
<b>Consultee Given Name</b>	Martine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I would like the local council to remove the following development sites from the local plan and consider looking at low infill areas rather than large developments that will damage the local area, put pressure</p>



	<p>on infrastructure that is already struggling with demand and change the character of the village that can never be regained should these developments occur.</p> <p>There is a large development proposed at Red Street which is a short distance from Audley and the amount of traffic pollution that would be caused across both these areas is ill advised. At peak times in the village the traffic can back up due to double parked cars in an already overcrowded area. The village can, at times become impassable and leads to people seeking short cuts around high pedestrian areas. The local roads cannot sustain the additional traffic that extra housing will bring, potentially 200 to 300 cars plus the direction of traffic when problems occur on M6/A500 when the village becomes a diversion route.</p> <p>Audley and Bignall End is a small rural village and does not have the necessary infrastructure to support and sustain these new developments and become to all intents and purposes a town. Currently, it is very difficult to get a GP/Dentist appointment and further residents will add to that strain. There is one primary school with limited space so people would need to travel out of the area to access schools, again adding to the congestion and adding to the environmental pollution.</p> <p>The main road – Ravens Lane is already congested, cars park on either side and it is difficult to pass when buses/tractors/larger goods vehicles are on the road, an additional 200 to 300 cars will add to these pressures and there is a real fear that road traffic accidents and incidents will rise.</p> <p>I have fears that the village, feelings of the residents, the local heritage is all being ignored. The fact that council members did not have time to look at all the relevant paperwork prior to voting this plan through speaks volumes, it is almost like it does not matter what we say, it will just be done to us anyway.</p> <p>Words fail me when thoughts turn to the removal of large swathes of greenbelt in one area, the proposed developments will increase the traffic on roads that are not able to cope with current volume and therefore are not justified. These sites need to be removed from the local plan as they are unjustifiable and hence unsound.</p>
<b>Comment ID</b>	NULLP1112
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Clewes
<b>Consultee Given Name</b>	Martine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I would like the local council to remove the following development sites from the local plan and consider looking at low infill areas rather than large developments that will damage the local area, put pressure on infrastructure that is already struggling with demand and change the character of the village that can never be regained should these developments occur.</p> <p>There is a large development proposed at Red Street which is a short distance from Audley and the amount of traffic pollution that would be caused across both these areas is ill advised. At peak times in the village the traffic can back up due to double parked cars in an already overcrowded area. The village can, at times become impassable and leads to people seeking short cuts around high pedestrian areas. The local roads cannot sustain the additional traffic that extra housing will bring, potentially 200 to 300 cars plus the direction of traffic when problems occur on M6/A500 when the village becomes a diversion route.</p> <p>Audley and Bignall End is a small rural village and does not have the necessary infrastructure to support and sustain these new developments and become to all intents and purposes a town. Currently, it is very difficult to get a GP/Dentist appointment and further residents will add to that strain. There is one primary school with limited space so people would need to travel out of the area to access schools, again adding to the congestion and adding to the environmental pollution.</p> <p>The main road – Ravens Lane is already congested, cars park on either side and it is difficult to pass when buses/tractors/larger goods vehicles are on the road, an additional 200 to 300 cars will add to these pressures and there is a real fear that road traffic accidents and incidents will rise.</p> <p>I have fears that the village, feelings of the residents, the local heritage is all being ignored. The fact that council members did not have time to look at all the relevant paperwork prior to voting this plan through speaks volumes, it is almost like it does not matter what we say, it will just be done to us anyway.</p> <p>Words fail me when thoughts turn to the removal of large swathes of greenbelt in one area, the proposed developments will increase the traffic on roads that are not able to cope with current volume and therefore are not justified. These sites need to be removed from the local plan as they are unjustifiable and hence unsound.</p>
<b>Comment ID</b>	NULLP1110
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street

<b>Consultee Family Name</b>	Clewes
<b>Consultee Given Name</b>	Martine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I would like the local council to remove the following development sites from the local plan and consider looking at low infill areas rather than large developments that will damage the local area, put pressure on infrastructure that is already struggling with demand and change the character of the village that can never be regained should these developments occur.</p> <p>There is a large development proposed at Red Street which is a short distance from Audley and the amount of traffic pollution that would be caused across both these areas is ill advised. At peak times in the village the traffic can back up due to double parked cars in an already overcrowded area. The village can, at times become impassable and leads to people seeking short cuts around high pedestrian areas. The local roads cannot sustain the additional traffic that extra housing will bring, potentially 200 to 300 cars plus the direction of traffic when problems occur on M6/A500 when the village becomes a diversion route.</p> <p>The proposed access site to AB12 – Via Diglake Street, a typical terraced street with cars parked on either side is unsustainable and dangerous. The expectation of residents of Diglake Street to park on a small car park at one end is ridiculous and unfair. Families with children and shopping, disabled people expected to walk due to this proposed access is unreasonable and unfair to these residents. To expect all new and old residents to access this site via this entrance is not safe and will cause noise and pollution within the area and equally there is potential for accidents as a lot of school children use this route walking to and from school daily. There is a children's playground next to the proposed construction site and this would have impact on the local population and their right to have access to such areas for physical and emotional development. I cannot understand why any sensible surveyor would consider this a sensible access point as they are extremely narrow for any long term, sustained access and will exacerbate the already existing traffic problems in the village. This proposal ineffective and unsound.</p> <p>Audley and Bignall End is a small rural village and does not have the necessary infrastructure to support and sustain these new developments and become to all intents and purposes a town. Currently, it is very difficult to get a GP/Dentist appointment and further residents will add to that strain. There is one primary school with limited space so people would need to travel out of the area to access schools, again adding to the congestion and adding to the environmental pollution.</p> <p>The main road – Ravens Lane is already congested, cars park on either side and it is difficult to pass when buses/tractors/larger goods vehicles are on the road, an additional 200 to 300 cars will add to these pressures and there is a real fear that road traffic accidents and incidents will rise.</p> <p>AB12 is high quality greenbelt and is close to an area that is prone to flooding, additional housing in this area would exacerbate flooding and impact on food security in this and other areas that will be affected by flooding. This site is not justified and consequently unsound.</p> <p>I have fears that the village, feelings of the residents, the local heritage is all being ignored. The fact that council members did not have time to look at all the relevant paperwork prior to voting this plan through speaks volumes, it is almost like it does not matter what we say, it will just be done to us anyway.</p> <p>Words fail me when thoughts turn to the removal of large swathes of greenbelt in one area, the proposed developments will increase the traffic on roads that are not able to cope with current volume and therefore are not justified. These sites need to be removed from the local plan as they are unjustifiable and hence unsound.</p>

<b>Comment ID</b>	NULLP265
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Betley, Balterley & Wrinehill Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Clough
<b>Consultee Given Name</b>	Muna
<b>Q6 Details</b>	<p>Dear Planning Policy</p> <p>COMMENTS FROM BETLEY, BALTERLEY AND WRINEHILL PARISH COUNCIL ON THE NEWCASTLE-UNDER-LYME LOCAL PLAN CONSULTATION 2024</p> <p>Please find below the Resolutions agreed by Betley, Balterley and Wrinehill Parish Council on the Newcastle-under-Lyme Local Plan Consultation 2024, which were agreed at an Extraordinary Meeting of the Parish Council held on 3rd October 2024:-</p> <p>RESOLVED</p> <ol style="list-style-type: none"> <li>1. The Local Plan be welcomed in principle;</li> <li>2. The Strategic Objectives and Policies be supported;</li> <li>3. Traffic through the village on the A531 has increased significantly over the last decade or so, and has now reached the point where at peak times it is already difficult to cross the road. If there was any further development in neighbouring wards the situation would be worse. Going forward, a significant increase in the traffic may require a radical solution;</li> </ol> <p>(This resolution was unanimous).</p> <p>The Neighbourhood Plan will be monitored and revised against the adopted Local Plan, (expected by 2026 and rolled to same end date 2040).</p> <p>I trust these comments will be taken into consideration when making your final decisions on the proposals contained within the Local Plan.</p>
<b>Comment ID</b>	NULLP266
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Company / Organisation</b>	Betley, Balterley & Wrinehill Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Clough
<b>Consultee Given Name</b>	Muna
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q6 Details</b>	<p>3. Traffic through the village on the A531 has increased significantly over the last decade or so, and has now reached the point where at peak times it is already difficult to cross the road. If there was any further development in neighbouring wards the situation would be worse. Going forward, a significant increase in the traffic may require a radical solution;</p> <p>(This resolution was unanimous).</p>

<b>Comment ID</b>	NULLP680
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>To whom it may concern, I wish to register my strong objection to the planning proposal AB12 at Bignall End.</p> <p>This proposal has not taken into consideration the pressure this will cause on the local road network, schooling, and healthcare. Not to mention the effect on wildlife, and mental health.</p> <p>As a resident of (redacted by admin) for my entire life I can tell you that the road infrastructure is already at capacity, with Ravens lane, and New Road already difficult to pass, as is Diglake street, a proposed access I believe.</p> <p>The building of over 120 houses will make this a living nightmare for local residents.</p> <p>These are small villages where dirt tracks progressed to thin tarmac roads, not really wide enough for car parking, and access to this site would be very difficult.</p> <p>The local primary school at Ravensmead also doesn't have any capacity for this many extra pupils either, as my wife commented, (redacted by admin).</p> <p>We want our villages to remain just that, villages. Countryside and the fact that this is a rural village is why I have remained here.</p> <p>The outlook of residents, and losing greenbelt is a big factor in mental health, and I urge anyone involved to scrap this proposal.</p>
<b>Q9 Hearing reasons</b>	Audley parish
<b>Comment ID</b>	NULLP433
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This application is not sound. This is a huge area of green belt land which is home to acres of natural wildlife. It is a beautiful area which local people use for exercise, and mental health stimulation. Whether that be walking, jogging or cycling. Green belt areas of this size should be protected at all costs, for the benefit of farming, nature, and the health of local people.</p> <p>This area is also situated on one of the busiest M6 junctions (16) This is already badly congested every day, with traffic trying to avoid it by bypassing through Audley, route being Alsager road, then B5500. This planning application would compound this significantly. Only last week there was a fatal accident which resulted in the closure of the A500 with traffic being diverted through afore mentioned route. A warehouse park of this size would make this junction almost unusable. There are warehousing estates only 2-3 miles south on the A34, and on Peacocks hay road which could be further developed.</p>
<b>Comment ID</b>	NULLP679
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I wish to register my objection to the proposal of industrial building on the AB 2 final draft.</p> <p>This current area is already a heavily congested traffic hotspot, and I strongly urge this proposal to be dropped. Every day junction 16 is heavily congested, with many accidents, the AB2 proposal will only make this worse. I currently live on the (redacted by admin), this road has become the bypass with users cutting through Audley, to avoid heavy congestion. Alsager road is also affected. These roads were not</p>

	<p>meant to take this volume of traffic. Warehouse units will add to this problem, and HGV vehicles will also use Audley in the same manner</p> <p>There are industrial units only a stones throw away at high carr on the A34 on a site that could be further developed instead, and off Peacocks Hay road, adjacent to this on the other side of the A500.</p> <p>The area is outstanding in natural beauty, and the adjacent lanes are used by a large local population for walking and cycling and jogging, this proposal will have a big effect on the mental health of local residents. Green belt land should be protected, the site is huge and the wildlife in the area will be driven away. I cannot believe that this particular area is even being considered given the affect on traffic, Wildlife and the beautiful countryside, when there are more suitable sites so close. Employment at warehousing is low and disproportionate to the huge area that this proposal with effect. I urge anyone involved to walk Park Lane and moat lane. They will realise that this proposal should not have even advanced this far and should be scrapped.</p>
<b>Comment ID</b>	NULLP681
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>To whom it may concern, I wish to register my objection to the AB15 planning proposal. Audley as a village cannot cope with more residential plans of his size.</p> <p>The village does not have the facilities or road infostructure to cope at the current moment, let alone with the proposal of new housing.</p> <p>I strongly object to the use of green belt sites such as this. Green belt should be protected at all cost and I feel that more Brownfield sites could, and should be investigated ,especially at a time when environmental issues are of the utmost importance.</p>
<b>Comment ID</b>	NULLP803
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Too who it may concern, I wish to register my objection to the building of 55 new homes in the proposed AB33 area.</p> <p>Audley village does not have the infostructure to cope with this amount of housing, whether that be health care, road network, or schooling.</p> <p>Traffic increase and pollution from this amount of housing, along with other considered sites is significant, at a time when we should be protecting green belt and encouraging farming.</p> <p>It is also a regular exercise route, for walking, jogging and cycling, so green space and mental health for local people is very important and we wish to keep Audley rural, and as a village.</p> <p>There is currently minimal parking in the village, this will make matters worse.</p> <p>The health centre struggles to cope with demand and local schools do not have capacity.</p> <p>There is no significant need for new builds, as there are plenty of houses for sale around the area of all types, so I disagree totally with this proposal, and ask for it to be rejected.</p>

<b>Comment ID</b>	NULLP1342
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Sharon
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1401
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Colclough
<b>Consultee Given Name</b>	Sharon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

**Additional Comments:**

Parkhouse Pit in the 1960s was full of water my father was a miner and spend days working up to his waist and the pumps were going all the time underground after 60 years must be full of water. Perhaps you should think twice about disturbing the land the floods on the A34 are horrid and the roads get closed another 450 houses being built could make this problem worse. Also building houses by Bradwell Hospital and St Martins at Talke will make our little estate feel trapped. I dont want the traffic going down Shrewsbury drive because thats what will happen its a rat race now with all the school traffic from St Chads school we have a lot of elderly people living down this road.

<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP573
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Cole
<b>Consultee Given Name</b>	Phillip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Ab2 Lorry Park</p> <p>a. Objection Page 109 (clause 3) : Existing full HGV overnight facilities and overnight parking are available at with direct access to the M6 at Sandbach Services ( 15 miles) and Keele Services ( 17 miles), on this basis this development is not needed and is therefore an unjustified development.</p> <p>The inclusion of this site in the local plan is therefore unsound.</p> <p>b. Objection Page 109 (clause 3) : The following statement "The management and operation arrangements for the lorry park provision to be agreed with National Highways in consultation with Staffordshire County Council" is questionable. The expectation that both of the of above organisations would be engaged in such an arrangement is unusual to say the least. HGV facilities such as suggested are best managed and operated by commercial organisations with the relevant skills, embedded industry knowledge and experience. This suggestion is without foundation or any evidence that is feasible. It is therefore unsound</p> <p>The inclusion of the arrangement Page 109 (3 ) in the local plan is therefore not sound.</p> <p>AB2 Objection Page 109 ( opening paragraph) : The allocation of the 22 Hectare strategic employment site does not justify the release of Green belt land. There are suitable vacant units in the area for example: land adjacent to A500 , Alsager, Radway Green, Chatterley Valley and other locations. In particular research &amp; development is better suited to areas local to universities e.g. Manchester , Birmingham, and Keele where the culture and environment is aligned with the expertise available. The release of Green belt for this 22 Hectare Strategic Employment site is not justified for reasons described above.</p> <p>The inclusion of the arrangement Page opening paragraph in the local plan is therefore not sound.</p> <p>AB2 Objection Page 109 (opening paragraph) : The remaining 80 Hectares of AB2 are unallocated in the local plan. The current use of this remaining 80 hectares has a history of successful agricultural use. The escalating loss of farmland in the UK for food production against the growing population will in future years become a serious problem. Release of the Green Belt Land for an unallocated use in unjustified and should be retained for agricultural use. Use of this land for housing was discounted by ARUP in supporting evidence as unsuitable for housing due to seasonal flooding. Release of the Green Belt Land for an unallocated use in not justified and should be retained for agricultural use.</p> <p>The inclusion of this 80 Hectare in AB2 with no allocated use is therefore not sound.</p> <p>AB2 Objection : Policy AB2 ( clause 2.) Any new junction established on the A500 at the location would involve some form of traffic controls in either direction to permit safe access or exit from AB2. Solutions that involve halting traffic on the A500 to permit access to and from AB2 will cause a serious increase in congestion and encourage drivers including HGV "rat running" around the surrounding area In particular Audley &amp; Bignall End Villages adding to an already increasing problem</p> <p>There is no demonstrable evidence to support that a new junction on the A500 is a feasible solution for access to AB2. The inclusion of this recommendation in the local plan is therefore not sound.</p>
<b>Comment ID</b>	NULLP574
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Cole
<b>Consultee Given Name</b>	Phillip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB12 Objection Page 111 (clause 2 &amp; 3) The AB12 site has been allocated for 125 homes. However, the site has poor access through Diglake Street and the B5500. The use of Diglake Street will negatively affect residents, particularly elderly or disabled individuals and mothers with small children who rely on close vehicle access. Increased vehicle movement on the narrow street poses serious road safety issues. Offsite parking presents security concerns and challenges for charging vehicles.</p> <p>Considering the ever-increasing traffic through Bignall End, serious congestion is likely at the Diglake Street entry and exit during peak times . It is disturbing that Newcastle-under-Lyme Borough Council (NULB) has chosen to ignore the concerns of Diglake Street residents and expert opinions provided by Staffordshire County Council Highways . Despite these concerns, NULBC continues to cite Diglake Street as suitable access to the AB12 site. The submission from Staffordshire Highways as detailed below taken from the Regulation 18 Consultation Report was apparently ignored. This final draft of the local plan still promotes Diglake Street as preferred option for access to AB12 .</p> <p>Relevant text form The 2018 Consultation Report Sec 47, page 111 Land east of Diglake Street</p>

"Staffordshire County Council - The Highway Authority would raise concern with the outlined access strategy. I can confirm that the site has sufficient road frontage on Diglake Street to create an access however there are off site access issues that will need to be fully addressed in regard to on street parking on Diglake street and intensification of use of the Diglake St/B5500 junction. Access to the field is presently taken from the B5500, however it is of insufficient width in its current form to serve the proposed development unless it can be improved. Preference would be for the development to be served via the higher order road (B5500)"

The site AB12 is unjustified in its current form due to inappropriate access requirements and quality of life impact to residents on the residents of Diglake street .

The continued inclusion of Diglake Street as a suitable access to AB12 and apparent dismissal of Staffordshire County Council Highway Recommendation is not a sound inclusion in the local Plan.

<b>Comment ID</b>	NULLP683
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Cooke
<b>Consultee Given Name</b>	Matthew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I'm writing to share my concerns about the residential development planned for Marsh Parade under Policy TC22. I'm particularly worried about the lack of effective noise mitigation measures that could seriously affect The Rigger, a grassroots live music venue that plays a huge role in the cultural scene of Newcastle-under-Lyme. While I see that the policy includes a requirement for a noise and odour assessment (as mentioned on Page 155), it doesn't fully address the unique challenges The Rigger faces, especially given its close proximity to the proposed development. As new residents move in, it's likely they'll file noise complaints against The Rigger, which could lead to significant restrictions on its operations. This would not only impact the venue but also the local community that relies on it for live music and entertainment. Moreover, it seems that the policy overlooks the "Agent of Change" principle outlined in the National Planning Policy Framework (NPPF). This principle clearly states that the responsibility for managing noise issues should lie with the developers, not the existing businesses. Without proper noise mitigation strategies and the inclusion of this principle in the policy, The Rigger could face unwarranted noise complaints, which might threaten its very existence. Losing this venue due to increased noise complaints would be a huge blow to our local economy and cultural identity. The Rigger isn't just a spot for live music; it's a gathering place that nurtures local talent and contributes to what makes Newcastle-under-Lyme special.</p>

<b>Comment ID</b>	NULLP435
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Cooper
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>NC13</p> <p>The proposed location and number of new build houses in location NC13 Harriseahead will completely spoil this village. The local roads already cannot cope with the amount of through traffic now, I cannot accept that appropriate monitoring has taken place to assess the current and potential future traffic and any modelling that has been done has not been made available for public scrutiny and comment. Any mention of modelling was swiftly glossed over in public meetings.</p> <p>No one has been allowed to assess the impact on wildlife at the location because the current owner has not given consent to allow appropriate analysis to be carried out but many local villagers have reported passionately that the area has flora and fauna that needs to be assessed and protected</p> <p>Also the Planning Portal as very difficult to navigate and submit comments and was not appropriate for many elderly members of the villiage who are not confident with or simply do not use computers. It is well known within the villiage that a lot of my neighbours gave up trying.</p> <p>It is pure and utter destruction which will significantly impact and in fact risk residents lives.</p>
<b>Q7 Modification</b>	Find an alternative place to build away from this greenbelt. I suggest only building on brownfield sites without destroying sites of local interest and stop playing party politics with our greenbelt (Shameful, childish behavior displayed at planning meetings held in Newcastle library buildings)
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP150
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Cooper
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Dear sir</p> <p>Far beit from me to deny people having their own homes. However I feel that there are a few things that need to be done first.For instance in Audley there is limited parking space even parking on the medical centre is difficult at times. No parking in Bignall End except on pavements. Streets such as Albert, Diglake, Hope and Tibb Streets plus all the way up Ravens Lane are all double parking making it difficult for all traffic and emergency vehicles to get through.In Bignall End where elderly people, mothers with prams and disabled people and children have to try and cross a very busy road therfore a very urgent need for a pedestrian crossing.Quite recently I went to catch a bus only to find 2 cars parked by the bus stop and I have a photo to prove it.So there needs to be a painted sign on the road as is on the other side.I do feel that there is a lot of things to consider before building 200 houses which equates to 400 people plus children plus cars and lighting the country side with warehouses which will only make the current situation worse.</p> <p>Looking forward to your reply</p> <p>Yours sincerely Roy Cooper (redacted by admin)</p>
<b>Comment ID</b>	NULLP151
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Cooper
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Dear sir</p> <p>Far beit from me to deny people having their own homes. However I feel that there are a few things that need to be done first.For instance in Audley there is limited parking space even parking on the medical centre is difficult at times. No parking in Bignall End except on pavements. Streets such as Albert, Diglake, Hope and Tibb Streets plus all the way up Ravens Lane are all double parking making it difficult for all traffic and emergency vehicles to get through.In Bignall End where elderly people, mothers with prams and disabled people and children have to try and cross a very busy road therfore a very urgent need for a pedestrian crossing.Quite recently I went to catch a bus only to find 2 cars parked by the bus stop and I have a photo to prove it.So there needs to be a painted sign on the road as is on the other side.I do feel that there is a lot of things to consider before building 200 houses which equates to 400 people plus children plus cars and lighting the country side with warehouses which will only make the current situation worse.</p> <p>Looking forward to your reply</p> <p>Yours sincerely Roy Cooper (redacted by admin)</p>
<b>Comment ID</b>	NULLP147
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Cooper
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Dear sir</p> <p>Far beit from me to deny people having their own homes. However I feel that there are a few things that need to be done first.For instance in Audley there is limited parking space even parking on the medical centre is difficult at times. No parking in Bignall End except on pavements. Streets such as Albert, Diglake, Hope and Tibb Streets plus all the way up Ravens Lane are all double parking making it difficult for all traffic and emergency vehicles to get through.In Bignall End where elderly people, mothers with prams and disabled people and children have to try and cross a very busy road therfore a very urgent need for</p>

	<p>a pedestrian crossing. Quite recently I went to catch a bus only to find 2 cars parked by the bus stop and I have a photo to prove it. So there needs to be a painted sign on the road as is on the other side. I do feel that there is a lot of things to consider before building 200 houses which equates to 400 people plus children plus cars and lighting the country side with warehouses which will only make the current situation worse.</p> <p>Looking forward to your reply</p> <p>Yours sincerely Roy Cooper (redacted by admin)</p>
<b>Comment ID</b>	NULLP149
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Cooper
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Dear sir</p> <p>Far be it from me to deny people having their own homes. However I feel that there are a few things that need to be done first. For instance in Audley there is limited parking space even parking on the medical centre is difficult at times. No parking in Bignall End except on pavements. Streets such as Albert, Diglake, Hope and Tibb Streets plus all the way up Ravens Lane are all double parking making it difficult for all traffic and emergency vehicles to get through. In Bignall End where elderly people, mothers with prams and disabled people and children have to try and cross a very busy road therefore a very urgent need for a pedestrian crossing. Quite recently I went to catch a bus only to find 2 cars parked by the bus stop and I have a photo to prove it. So there needs to be a painted sign on the road as is on the other side. I do feel that there is a lot of things to consider before building 200 houses which equates to 400 people plus children plus cars and lighting the country side with warehouses which will only make the current situation worse.</p> <p>Looking forward to your reply</p> <p>Yours sincerely Roy Cooper (redacted by admin)</p>

<b>Comment ID</b>	NULLP1139
<b>Order</b>	180
<b>Title</b>	Policy KS3 Land at Blackbank Road, Knutton
<b>Consultee Family Name</b>	Cotterill
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS3
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>a. Legally compliant No ? b. Sound No ?</p> <p>I would consider the development of the <u>whole</u> site to be unsound as it would be a huge loss of public open space to the local community, is in constant use by dog walkers, primarily and children and there familys. By developing the whole site it would force the public onto nearby farmland. We have enough trouble with dogs of leads already and our animals suffer as a consequence (cos and calfs). Basically more people with less open space will have an impact on our community and our small farm. Also the south west corner is prone to flooding.</p>
<b>Q7 Modification</b>	Please consider setting aside a generous area as public open space preferably on the west side to include a no mow grass area for the public to walk dogs etc, and the existing hedge row for wildlife cover with gated access. For maintenance of hedge/grass etc
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I feel very strongly opposed to the loss of green space in general

<b>Comment ID</b>	NULLP335
<b>Order</b>	66
<b>Number</b>	8
<b>Title</b>	Employment
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please see attached letter which sets out the Council's position in this respect. Please do not dilute the comments in officer's reports as it will take them out of context. This letter should be read alongside the earlier representations made in 2021 and 2023.
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	For the reasons set out in the attached letter.
<b>Q10 File 1</b>	6386349
<b>Q10 File 2</b>	6386348
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf (1)</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf (1)</a>
<b>Comment ID</b>	NULLP337
<b>Order</b>	18
<b>Title</b>	Local Plan Key Diagram
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Audley is shown as a District Centre and is referred to in the document as such - this is incorrect as Audley is a Local Centre.
<b>Comment ID</b>	NULLP334
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Appendix 7
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347

<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP492
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy HOU 1: Affordable Housing APC would again emphasise the importance of affordable housing policy being applied consistently through the development management process, including for housing development in rural settlements.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP496
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy SE1: Pollution, Contamination and Amenity Site(s) AB2 or AB2A would not comply with the policy due to adverse impacts (light, noise and air quality).</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP480
<b>Order</b>	151

<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Sites AB12, AB15 and AB33 are all within Audley Parish. APC accepts that some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. APC would emphasise that green belt release should only occur in exceptional circumstances, but accepts that there are no alternative sites that would not involve green belt release.</p> <p>The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP484
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>APC notes that Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP483



<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>PSD1 Overall Development Strategy</p> <p>The targets for new housing in the borough and in the Audley Parish are unnecessarily high and will involve the destruction of valuable greenbelt and serve to further undermine the weaker housing markets in the Borough, Stoke-on-Trent and Crewe.</p> <p>Despite the completion of 2,240 dwellings between 2011/12 and 2020/21, the population actually decreased (from 123,871 to 123,300) and the number of households grew by only 849. Government data on empty homes indicates that there were 1,688 empty homes in the Borough in October 2023. The 2021 census indicates that there were 53,423 households in 2021, whereas council tax records indicate that there were 57,627 dwellings.</p> <p>In terms of housing costs, Newcastle-under-Lyme is one of England's lowest priced places to live. In 2023, the average cost of a first-time buyer's home was £176,000 compared to the national average of £241,502. The ONS official house price to income ratio was 5.52 in 2023, compared to the national average of 8.14. For Audley, the ratio is lower still, at 4.12. Private rents averaged £705 per month in 2023, compared to the national average of £1,279.</p> <p>The key issues in Audley and the Borough as a whole concern the range of housing options available and the need to tackle endemic under-occupation by older households. Audley lacks options for older households wishing to downsize or younger people wanting apartments. In Audley and the Borough, the population is ageing. In 2023, 9,731 people moved in from outside areas compared to only 7,719 out movers.</p> <p>The planned level of growth will simply accelerate problems of urban decay, especially in Stoke-on-Trent. There is no economic or social case for the numbers involved.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP487
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy PSD 5: Green Belt and Safeguarded Land</p> <p>See earlier comments on housing site allocations and green belt release. We object to the release of site AB2 or AB2A from the green belt, as it would harm green belt purposes relating to safeguarding the countryside from encroachment and assisting in urban regeneration, contradicting Policy PSD 5.</p>

<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP491
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy CRE 2: Renewable Energy The focus of the policy should be widened beyond solar and wind energy, for example to include geo-thermal energy from mineshafts. This is addressed in the submitted Audley Neighbourhood Plan.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP495
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy RET 1: Retail The policy is still out-of-kilter with current thinking on high street recovery. There needs to be far more emphasis on diversification and uses that bring people into towns and high streets, for example food and drink, recreation, cultural uses, community facilities and other local facilities.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP474
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Consultation (legal Compliance)
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Consultation (Legal Compliance)</p> <p>We note that few of the issues raised at the Regulation 18 stage have been addressed. One of the issues raised was the failure to run a 'Gunning' compliant consultation. We note that this was ignored. It is unclear how our previous comments on Site AB2 were taken into account, or whether they were taken into account.</p> <p>Our view remains that the Regulation 18 consultation was unlawful.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP478
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Sites AB12, AB15 and AB33 are all within Audley Parish. APC accepts that some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. APC would emphasise that green belt release should only occur in exceptional circumstances, but accepts that there are no alternative sites that would not involve green belt release.</p> <p>The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education and other</p>

	facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP482
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Strategic Objectives
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>APC supports the strategic objectives and notes that built heritage has been added, but with no mention of culture, or its potential in helping achieve economic transformation. Given the emphasis many local authorities place on culture and economic development, this is a surprising omission.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP486
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy PSD 4: Development Boundaries and the Open Countryside There is still no recognition of role of Neighbourhood Plans in further enabling and shaping development.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP490
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy CRE 1: Climate Change APC don't understand the meaning of clause 7. There is still nothing on walkable neighbourhoods (including mixed use, retention of local facilities, support for home working and ease of pedestrian movement). Audley village is an example of a walkable neighbourhood. There should be a far greater emphasis on climate resilience (for example, addressing overheating of homes and water capture).</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP494
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy EMP 1: Employment APC would strongly object to strategic employment site allocation AB2 (see previous comments).</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347

<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP477
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Sites AB2 and AB2A</p> <p>APC strongly objects to the proposed allocation of Site AB2/AB2A (A500/M6). The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the UrbanVision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land. These recent reports appear to have been ignored.</p> <p>Removal of the site(s) from the green belt would undermine the purposes for green belts set out in the NPPF, in particular by allowing major incursion and encroachment into the countryside and undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside. The economic impact on the conurbation would be negative, due to:</p> <ul style="list-style-type: none"> <li>• the remoteness of the site(s);</li> <li>• the impact on the viability of alternative urban sites in the conurbation.</li> <li>• Harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to local food growing capacity and agricultural employment. The traffic impacts would be negative, including: <ul style="list-style-type: none"> <li>• Generation of road-based traffic and lack of sustainable transport alternatives;</li> <li>• Traffic impacts on the rural character of the area;</li> <li>• Impacts on the amenity and safety of rural roads and lanes.</li> </ul> </li> </ul> <p>The development of this site would be unsustainable and environmentally harmful, due to:</p> <ul style="list-style-type: none"> <li>• biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscapes;</li> <li>• development of greenfield land in an unsustainable location, remote from the existing urban conurbation;</li> <li>• a range of significant adverse impacts (visual, noise, light, disturbance, air quality). The development would introduce a major urban employment site within a rural parish, near to small rural villages and remote from local services. The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE green belt assessment reports. (Hectares)</li> </ul> <p>The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...".</p> <p>The Table on page N37 identifies that site AB2 would have major negative impacts on: 'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.</p> <p>We note that positive impacts are identified for 'Climate Change' and 'Economy'. We believe that this finding is perverse. It is difficult to see how the development of a remote site, well outside of the urban conurbation, involving the loss of agricultural land and relying on road-based travel could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation has clearly not been taken into account.</p> <p>Site variation AB2A is not mentioned so presumably has not been assessed. Tables N10 and N11 set out growth strategy options. We note that option 6D does not include site AB2 and delivers better scores/outcomes.</p> <p>The Newcastle-under-Lyme Landscape &amp; Visual Appraisal March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.</p> <p>The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network. A copy of this report is included.</p> <p>The Strategic Housing &amp; Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable &amp; Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and</p>



	<p>with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation. Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under-Lyme &amp; Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.</p> <p>Development of AB2 would be harmful to the local economy, community and environment. The site assessment is not supported by evidence and assessments (though we note the site has been deleted from updates of some of those assessments). Allocation of the site conflicts with several of the proposed policies of the Local Plan.</p> <p>Conclusion</p> <p>APC believe that the Local Plan is fundamentally flawed. Allocation of site AB2/AB2A is in contradiction to the Local Plan's own evidence base and emerging policies and also inconsistent with national policy and guidance. It would cause substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire conurbation.</p> <p>There are clear problems in terms of soundness, especially in terms of justification, effectiveness (including cross-boundary strategic considerations) and consistency with national policy.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a> <a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a>
<b>Comment ID</b>	NULLP481
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Sites AB12, AB15 and AB33 are all within Audley Parish. APC accepts that some housing growth is needed to meet local housing need, including small (one bedroom) and family (4 bedroom) accommodation and homes suitable for older people and those with limited mobility. The sites are close to existing settlements and do not create coalescence between settlements. APC would emphasise that green belt release should only occur in exceptional circumstances, but accepts that there are no alternative sites that would not involve green belt release.</p> <p>The new housing would help to ensure that existing shops and other facilities in Audley and Bignall End remain viable. The increase in population would place more pressure on health, education and other facilities and this one of the main concerns for many residents. The provision of a safe and adequate access would be essential for all sites.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP485

<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>APC notes that Audley is identified as a 'District Centre', with Wolstanton, Chesterton and Silverdale. This is an obvious error and Audley should be classed as a 'Local Centre', as in previous versions of the Plan.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a> <a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a>
<b>Comment ID</b>	NULLP489
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy PSD 7: Design</p> <p>The term 'beautiful' should be removed, given the proposed changes to the NPPF. APC note that there is still insufficient emphasis on permeability, connectivity, green infrastructure and quality of the public realm. There is no mention of the National Design Guide 2021 and the ten priorities for design that it identifies.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP493
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density

<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy HOU 2: Housing Mix, Density and Standards Appropriate densities would vary across the Borough and depend on a wider range of factors than those mentioned in the policy.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>
<b>Comment ID</b>	NULLP497
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Family Name</b>	Council
<b>Consultee Given Name</b>	Audley Parish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Please note the contents of the attached letter which sets out the Council's comments in this regard. Please do not dilute the comments in any officer reports as the document needs to be read in context alongside the previous responses made.</p> <p>Policy SE9: Historic Environment It would be useful to recognise the role of neighbourhood plans in providing more locally specific policies on heritage.</p>
<b>Q7 Modification</b>	As above
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As set out in this response and the previous 2 responses - the Parish Council has strong objections in particular to the inclusion of AB2.
<b>Q10 File 1</b>	6386347
<b>Q10 File 2</b>	6386346
<b>Attachments</b>	<a href="#">Audley UVE Letter V1.2 Oct 2024 FINAL reps.pdf</a> <a href="#">App A SWT Audley Parish - Natural Capital Assessment FINAL REPORT.pdf</a>

<b>Comment ID</b>	NULLP718
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Cunningham
<b>Consultee Given Name</b>	Helena
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>F.A.O Planning Policy Team</p> <p>I write to strongly object to proposals within the Local Plan in particular the allocations for sites, AB2, AB2A, AB12, AB15 and AB33 and do not believe it has been completed in a lawful way.</p> <p>I do not believe the Borough Council have taken into account any feedback that they have been given since the first round of consultations and have ploughed ahead with a Local Plan that is not fit for purpose.</p> <p>The sites within this allocation fall within greenbelt land and the Council is yet to exhaust all brownfield sites and have vacant buildings within the borough that have stood empty for years.</p> <p>The release of greenbelt land for the sites AB2 and AB2A do not make strategic sense due to location and the impact that it will have on the rural parish of Audley. Again, there are vacant sites within the Newcastle under Lyme boundary that can be utilized without the need to release greenbelt land (e.g the old Makro site and other unit within the Chesterton/Waterhayes area)</p> <p>Whilst some housing may be needed, I do not believe that greenbelt land should be released for this within the parish as there are better options elsewhere within Newcastle under Lyme.</p> <p>My main objection with the housing developments is for site AB33, placing houses on this site will lead to further issues for the community. This site is agricultural land and is in use currently (see attached photo). You state the site is not in use, yet the photos contradict this, you also say that it is surface water flooding, yet the flood has been there for a significant length of time, which indicates it is more than surface water. I believe that the new housing would have a detrimental impact on local services, the roads/footpath infrastructure is already poor. There is double parking throughout the village, people with prams/wheelchairs are often forced into the roads and to suggest building further housing will only exacerbate the issues.</p> <p>To build an access road onto Nantwich Road is a huge cause for concern, this road is continually busy with traffic with users often travelling above the speed limit of the road. The road acts as a cut through from those heading both north and south for work etc. Park Road also does not have the infrastructure in place to do this.</p> <p>Newcastle under Lyme should be acting more strategically and resurrect a joint Local Plan with Stoke on Trent Council. The Councils should be working in partnership to develop a plan that will bring life back to the City and in turn make people want to visit and settle here. I do not believe that there is sound evidence the housing numbers or development numbers that you have put forward.</p> <p>I believe that the Local Plan is poor, is full of contradictions and does not adhere to local or national policy. It is simply not fit for purpose and should not be progressed in its current state when you have received so much negative feedback at all stages of the process.</p> <p>Regards</p>
<b>Comment ID</b>	NULLP720
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Cunningham
<b>Consultee Given Name</b>	Helena
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>F.A.O Planning Policy Team</p> <p>I write to strongly object to proposals within the Local Plan in particular the allocations for sites, AB2, AB2A, AB12, AB15 and AB33 and do not believe it has been completed in a lawful way.</p> <p>I do not believe the Borough Council have taken into account any feedback that they have been given since the first round of consultations and have ploughed ahead with a Local Plan that is not fit for purpose.</p> <p>The sites within this allocation fall within greenbelt land and the Council is yet to exhaust all brownfield sites and have vacant buildings within the borough that have stood empty for years.</p> <p>The release of greenbelt land for the sites AB2 and AB2A do not make strategic sense due to location and the impact that it will have on the rural parish of Audley. Again, there are vacant sites within the Newcastle under Lyme boundary that can be utilized without the need to release greenbelt land (e.g the old Makro site and other unit within the Chesterton/Waterhayes area)</p> <p>Whilst some housing may be needed, I do not believe that greenbelt land should be released for this within the parish as there are better options elsewhere within Newcastle under Lyme.</p>

	<p>My main objection with the housing developments is for site AB33, placing houses on this site will lead to further issues for the community. This site is agricultural land and is in use currently (see attached photo). You state the site is not in use, yet the photos contradict this, you also say that it is surface water flooding, yet the flood has been there for a significant length of time, which indicates it is more than surface water. I believe that the new housing would have a detrimental impact on local services, the roads/footpath infrastructure is already poor. There is double parking throughout the village, people with prams/wheelchairs are often forced into the roads and to suggest building further housing will only exacerbate the issues.</p> <p>To build an access road onto Nantwich Road is a huge cause for concern, this road is continually busy with traffic with users often travelling above the speed limit of the road. The road acts as a cut through from those heading both north and south for work etc. Park Road also does not have the infrastructure in place to do this.</p> <p>Newcastle under Lyme should be acting more strategically and resurrect a joint Local Plan with Stoke on Trent Council. The Councils should be working in partnership to develop a plan that will bring life back to the City and in turn make people want to visit and settle here. I do not believe that there is sound evidence the housing numbers or development numbers that you have put forward.</p> <p>I believe that the Local Plan is poor, is full of contradictions and does not adhere to local or national policy. It is simply not fit for purpose and should not be progressed in its current state when you have received so much negative feedback at all stages of the process.</p> <p>Regards</p>
<b>Comment ID</b>	NULLP717
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Cunningham
<b>Consultee Given Name</b>	Helena
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>F.A.O Planning Policy Team</p> <p>I write to strongly object to proposals within the Local Plan in particular the allocations for sites, AB2, AB2A, AB12, AB15 and AB33 and do not believe it has been completed in a lawful way.</p> <p>I do not believe the Borough Council have taken into account any feedback that they have been given since the first round of consultations and have ploughed ahead with a Local Plan that is not fit for purpose.</p> <p>The sites within this allocation fall within greenbelt land and the Council is yet to exhaust all brownfield sites and have vacant buildings within the borough that have stood empty for years.</p> <p>The release of greenbelt land for the sites AB2 and AB2A do not make strategic sense due to location and the impact that it will have on the rural parish of Audley. Again, there are vacant sites within the Newcastle under Lyme boundary that can be utilized without the need to release greenbelt land (e.g the old Makro site and other unit within the Chesterton/Waterhayes area)</p> <p>Whilst some housing may be needed, I do not believe that greenbelt land should be released for this within the parish as there are better options elsewhere within Newcastle under Lyme.</p> <p>My main objection with the housing developments is for site AB33, placing houses on this site will lead to further issues for the community. This site is agricultural land and is in use currently (see attached photo). You state the site is not in use, yet the photos contradict this, you also say that it is surface water flooding, yet the flood has been there for a significant length of time, which indicates it is more than surface water. I believe that the new housing would have a detrimental impact on local services, the roads/footpath infrastructure is already poor. There is double parking throughout the village, people with prams/wheelchairs are often forced into the roads and to suggest building further housing will only exacerbate the issues.</p> <p>To build an access road onto Nantwich Road is a huge cause for concern, this road is continually busy with traffic with users often travelling above the speed limit of the road. The road acts as a cut through from those heading both north and south for work etc. Park Road also does not have the infrastructure in place to do this.</p> <p>Newcastle under Lyme should be acting more strategically and resurrect a joint Local Plan with Stoke on Trent Council. The Councils should be working in partnership to develop a plan that will bring life back to the City and in turn make people want to visit and settle here. I do not believe that there is sound evidence the housing numbers or development numbers that you have put forward.</p> <p>I believe that the Local Plan is poor, is full of contradictions and does not adhere to local or national policy. It is simply not fit for purpose and should not be progressed in its current state when you have received so much negative feedback at all stages of the process.</p> <p>Regards</p>
<b>Comment ID</b>	NULLP721
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Cunningham

<b>Consultee Given Name</b>	Helena
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>F.A.O Planning Policy Team</p> <p>I write to strongly object to proposals within the Local Plan in particular the allocations for sites, AB2, AB2A, AB12, AB15 and AB33 and do not believe it has been completed in a lawful way.</p> <p>I do not believe the Borough Council have taken into account any feedback that they have been given since the first round of consultations and have ploughed ahead with a Local Plan that is not fit for purpose.</p> <p>The sites within this allocation fall within greenbelt land and the Council is yet to exhaust all brownfield sites and have vacant buildings within the borough that have stood empty for years.</p> <p>The release of greenbelt land for the sites AB2 and AB2A do not make strategic sense due to location and the impact that it will have on the rural parish of Audley. Again, there are vacant sites within the Newcastle under Lyme boundary that can be utilized without the need to release greenbelt land (e.g the old Makro site and other unit within the Chesterton/Waterhayes area)</p> <p>Whilst some housing may be needed, I do not believe that greenbelt land should be released for this within the parish as there are better options elsewhere within Newcastle under Lyme.</p> <p>My main objection with the housing developments is for site AB33, placing houses on this site will lead to further issues for the community. This site is agricultural land and is in use currently (see attached photo). You state the site is not in use, yet the photos contradict this, you also say that it is surface water flooding, yet the flood has been there for a significant length of time, which indicates it is more than surface water. I believe that the new housing would have a detrimental impact on local services, the roads/footpath infrastructure is already poor. There is double parking throughout the village, people with prams/wheelchairs are often forced into the roads and to suggest building further housing will only exacerbate the issues.</p> <p>To build an access road onto Nantwich Road is a huge cause for concern, this road is continually busy with traffic with users often travelling above the speed limit of the road. The road acts as a cut through from those heading both north and south for work etc. Park Road also does not have the infrastructure in place to do this.</p> <p>Newcastle under Lyme should be acting more strategically and resurrect a joint Local Plan with Stoke on Trent Council. The Councils should be working in partnership to develop a plan that will bring life back to the City and in turn make people want to visit and settle here. I do not believe that there is sound evidence the housing numbers or development numbers that you have put forward.</p> <p>I believe that the Local Plan is poor, is full of contradictions and does not adhere to local or national policy. It is simply not fit for purpose and should not be progressed in its current state when you have received so much negative feedback at all stages of the process.</p> <p>Regards</p>
<b>Comment ID</b>	NULLP719
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Cunningham
<b>Consultee Given Name</b>	Helena
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>F.A.O Planning Policy Team</p> <p>I write to strongly object to proposals within the Local Plan in particular the allocations for sites, AB2, AB2A, AB12, AB15 and AB33 and do not believe it has been completed in a lawful way.</p> <p>I do not believe the Borough Council have taken into account any feedback that they have been given since the first round of consultations and have ploughed ahead with a Local Plan that is not fit for purpose.</p> <p>The sites within this allocation fall within greenbelt land and the Council is yet to exhaust all brownfield sites and have vacant buildings within the borough that have stood empty for years.</p> <p>The release of greenbelt land for the sites AB2 and AB2A do not make strategic sense due to location and the impact that it will have on the rural parish of Audley. Again, there are vacant sites within the Newcastle under Lyme boundary that can be utilized without the need to release greenbelt land (e.g the old Makro site and other unit within the Chesterton/Waterhayes area)</p> <p>Whilst some housing may be needed, I do not believe that greenbelt land should be released for this within the parish as there are better options elsewhere within Newcastle under Lyme.</p> <p>My main objection with the housing developments is for site AB33, placing houses on this site will lead to further issues for the community. This site is agricultural land and is in use currently (see attached photo). You state the site is not in use, yet the photos contradict this, you also say that it is surface water flooding, yet the flood has been there for a significant length of time, which indicates it is more than surface water. I believe that the new housing would have a detrimental impact on local services, the roads/footpath infrastructure is already poor. There is double parking throughout the village, people with prams/wheelchairs are often forced into the roads and to suggest building further housing will only exacerbate the issues.</p>



To build an access road onto Nantwich Road is a huge cause for concern, this road is continually busy with traffic with users often travelling above the speed limit of the road. The road acts as a cut through from those heading both north and south for work etc. Park Road also does not have the infrastructure in place to do this.

Newcastle under Lyme should be acting more strategically and resurrect a joint Local Plan with Stoke on Trent Council. The Councils should be working in partnership to develop a plan that will bring life back to the City and in turn make people want to visit and settle here. I do not believe that there is sound evidence the housing numbers or development numbers that you have put forward.

I believe that the Local Plan is poor, is full of contradictions and does not adhere to local or national policy. It is simply not fit for purpose and should not be progressed in its current state when you have received so much negative feedback at all stages of the process.

Regards

<b>Comment ID</b>	NULLP852
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Cuthbert
<b>Consultee Given Name</b>	Kim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>Re: Formal Objection to Proposed AB2 Site Allocation in the Local Plan</b></p> <p><b>F.A.O: Planning Department</b></p> <p>Dear Sir/Madam,</p> <p>I am writing to submit my formal objection to the proposed industrial development at site AB2, located near Junction 16 of the M6. This site is currently designated as Greenbelt land and its release for industrial development is both unjustified and undeliverable, rendering the proposal unsound. The failure to adequately demonstrate the need for this scale of development, alongside concerns about the deliverability of necessary infrastructure improvements, further undermines the viability of the proposal.</p> <p><b>1 High Growth Strategy: Lack of Justification</b></p> <p>Newcastle-under-Lyme Borough Council (NuLBC) has adopted a high growth strategy to justify significant land allocations, including the AB2 site. However, there is no robust evidence to support the assumption that such growth will materialise. The local economy does not show the kind of expansion that would warrant the allocation of 80 hectares of land for industrial use, particularly in an area already well-served by existing and upcoming developments in nearby Stoke-on-Trent and Cheshire East. The assumption that the borough will require such vast strategic employment land is neither justified nor proportionate to the actual needs of the community. Without solid evidence of this projected growth, the strategy is unsound.</p> <p><b>1 Oversupply of Employment Land at AB2</b></p> <p>The council's Local Plan states that 22 hectares of strategic employment land are required to meet future needs, yet 80 hectares are being allocated at the AB2 site alone. This gross oversupply is not only excessive but also lacks justification. Such an inflated allocation of land cannot be deemed sound when it far exceeds the strategic employment needs outlined by the council itself. Moreover, with other developments underway in the region, there is no clear or pressing need to release Greenbelt land on this scale. The failure to balance supply with actual demand makes this proposal unjustified and unsound.</p> <p><b>1 Unsustainable Traffic and Infrastructure Impact</b></p> <p>The current infrastructure surrounding the AB2 site, particularly at Junction 16 of the M6, is already strained by high levels of traffic. The proposed development would exacerbate congestion, particularly on local roads, which are ill-equipped to handle a significant increase in heavy goods vehicles (HGVs). NuLBC has not provided any evidence that the necessary funding for major upgrades to Junction 16 will be secured, especially in light of the national £22 billion shortfall in infrastructure finances. It is highly unlikely that the required investment from Highways England will be delivered before the end of the local plan period (2040), meaning that the infrastructure improvements needed to support this development are not deliverable. As a result, the proposal is ineffective and therefore unsound.</p> <p><b>1 Greenbelt Release: Lack of Exceptional Circumstances</b></p> <p>The NPPF stipulates that Greenbelt land should only be released in 'exceptional circumstances', a threshold that this proposal fails to meet. There is no evidence that releasing Greenbelt land for industrial use is necessary when there are alternative sites available both locally and regionally that are better suited to development. The Greenbelt serves an essential purpose in preventing urban sprawl, protecting the countryside, and preserving the rural character of villages like Audley. The absence of compelling reasons for Greenbelt release renders this proposal unjustified and in violation of the principles of sustainable development outlined in both the NPPF and local planning policy.</p> <p><b>1 Inadequate Infrastructure and Deliverability Concerns</b></p> <p>The infrastructure required to support this development—including roads, utilities, and public services—will not be in place within a reasonable timeframe. In addition to the lack of funding for essential road upgrades, the development will place unsustainable pressure on local services such as health care, education, and emergency services. The long timeline for delivering such infrastructure improvements, if they can be delivered at all, compromises the effectiveness of the entire development plan. This failure to ensure deliverability further underscores the unsoundness of the proposal.</p> <p><b>1 Impact on Air Quality, Environment, and Local Amenity</b></p> <p>Beyond the issues of justification and deliverability, the proposed development will cause irreparable damage to the environment and local community. The grasslands at the AB2 site play a crucial role in maintaining air quality by absorbing pollutants from the nearby M6 and A500 corridors. Their removal would increase the level of harmful emissions in the area, worsening air quality and posing health risks to local residents, particularly those most vulnerable, such as children and the elderly.</p> <p>Additionally, the loss of wildlife habitats, the increase in light and noise pollution, and the disruption to local amenity spaces would significantly diminish the quality of life for residents in nearby villages. The lanes surrounding the proposed site—Park Lane, Moat Lane, and Barthomley Road—are frequently used by walkers, cyclists, and horse riders who will lose access to these cherished rural spaces. The</p>

rural identity and character of the area will be eroded, further contributing to the unsoundness of the plan, which does not take the long-term social and environmental consequences into account.

**Conclusion: Unsound and Undeliverable Proposal**

In conclusion, the proposed AB2 development is both unjustified and undeliverable. The inflated allocation of employment land, lack of evidence for high growth, insufficient infrastructure, and absence of exceptional circumstances for Greenbelt release render this proposal unsound. The negative impacts on traffic, air quality, wildlife, and local amenity make this development not only harmful to the community but also ineffective in achieving the strategic objectives of the local plan. I urge Newcastle-under-Lyme Borough Council to reconsider this development and retain the Greenbelt protections that are essential for preserving our rural environment and community well-being.

I trust that my concerns will be given due consideration during the Regulation 19 consultation and urge the council to reject the AB2 site allocation as part of the Local Plan.

<b>Comment ID</b>	NULLP479
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Dale
<b>Consultee Given Name</b>	Lois
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Please accept these comments in relation to the local plan, 2020-2040.</p> <p>I am a (redacted by admin), therefore my comments are directed towards the building proposals SP11 1,2,3 and 4, and SP23.</p> <p>I understand that there is a need to build new and affordable housing. My concerns with the proposal is how these areas of new houses will impact on Silverdale.</p> <p>Firstly, the houses are planned to be built in Silverdale, but are being badged as Keele, which is quite frankly offensive to the people of silverdale.</p> <p>Secondly, I think the road systems which will support these building areas need to be very carefully considered. I think traffic should be directed away from Silverdale and towards Cemetry Road and Keele bypass to prevent Silverdale being used as a 'rat run'. The roads in the village are not big enough to deal with a significant increase in traffic. In particular, Park Road and Racecourse are not appropriate routes to direct traffic and this will have a detrimental effect on residents if this is not addressed.</p> <p>Thirdly, what are the plans for infrastructure to support the new residents? High school, Gp practice, dentist, local shops? I can see the plan for a primary school, but where will the children go after primary school?</p> <p>Fourthly, I can see there are plans to keep some green space up the golf course which is a positive, but what reassurance can you provide to residents that this will be honoured and not altered at the last minute. Green space is really important to the local area as it is one of the unique selling points for people being attracted to the area.</p> <p>Lastly, What reassurance can you give that those people who have been integral to developing the plan have taken the time to visit the area in order to understand the impact of the housing developments and the proposed access routes.</p> <p>I would also like to say that the reason I have emailed my comments is because the local plan is so large and overwhelming, it is very difficult to navigate. I expect this will impact on the number of people who feel able to comment, thus impacting on the influence local residents may have in shaping the future of our local area.</p>
<b>Comment ID</b>	NULLP1105
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Dale
<b>Consultee Given Name</b>	Lois
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Please accept these comments in relation to the local plan, 2020-2040.</p> <p>I am a (redacted by admin), therefore my comments are directed towards the building proposals SP11 1,2,3 and 4, and SP23.</p> <p>I understand that there is a need to build new and affordable housing. My concerns with the proposal is how these areas of new houses will impact on Silverdale.</p> <p>Firstly, the houses are planned to be built in Silverdale, but are being badged as Keele, which is quite frankly offensive to the people of silverdale.</p> <p>Secondly, I think the road systems which will support these building areas need to be very carefully considered. I think traffic should be directed away from Silverdale and towards Cemetry Road and Keele bypass to prevent Silverdale being used as a 'rat run'. The roads in the village are not big enough to deal with a significant increase in traffic. In particular, Park Road and Racecourse are not appropriate routes to direct traffic and this will have a detrimental effect on residents if this is not addressed.</p> <p>Thirdly, what are the plans for infrastructure to support the new residents? High school, Gp practice, dentist, local shops? I can see the plan for a primary school, but where will the children go after primary school?</p> <p>Fourthly, I can see there are plans to keep some green space up the golf course which is a positive, but what reassurance can you provide to residents that this will be honoured and not altered at the last minute. Green space is really important to the local area as it is one of the unique selling points for people being attracted to the area.</p>

Lastly, What reassurance can you give that those people who have been integral to developing the plan have taken the time to visit the area in order to understand the impact of the housing developments and the proposed access routes.

I would also like to say that the reason I have emailed my comments is because the local plan is so large and overwhelming, it is very difficult to navigate. I expect this will impact on the number of people who feel able to comment, thus impacting on the influence local residents may have in shaping the future of our local area.

<b>Comment ID</b>	NULLP811
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please refer to attachment.</p> <p>The layout and the format of the plan are not sufficiently clear in differentiating between the text of the policy and the supporting text. This need to be resolved to ensure the plan is usable. This issue is typically addressed in other plans but putting policy text in boxes, behind a grey background and/or indifferent text. HBF do not have a preference but there are many simple ways that could address our concern.</p> <p>Similar presentational issues affect the Vision and Strategic Objectives. Is the Vision all three paras in the vision section 4.1- 4.3, or just 4.1? We would also expect to see the Strategic Objectives in some kind of differentiated presentation and form them to be supported with some explanatory text. It is unclear where the Vision and Objectives come from, for example have they been informed by the Council's Corporate Strategy, Climate Change Plan, Housing Strategy etc? Or have they been created for this Local Plan specifically. Clarity is needed so the justification is clear so the Plan can be effective.</p>
<b>Q7 Modification</b>	Please refer to attachment.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP850
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified, effective or in line with national policy.</p> <p>The policy seems to require every single new house to meet the Building for a Healthy Life standard. It would seem unjustified and ineffective, unreasonable and disproportionate for a planning application for individual dwelling to have to undertake a full Building for a Healthy Life assessment and indeed it is not designed for such use.</p> <p>Although HBF is supportive of use of Building for a Healthy Life toolkit but note that it is not really a 'standard' to be achieved, but rather a toolkit for considering design and thinking about the qualities of successful places. The Local Plan needs to be clear about what 'meeting the standard' would entail, and what information would be needed to show that a development would achieve it. The policy is currently ineffective as it is unclear how a developer would show compliance with the policy as it is not really possible to 'achieve Building for a Healthy Life standard'.</p> <p>In order to be effective it is important for the difference between a Health Impact Assessment screening and a full Health Impact Assessment is explained in the Plan.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)



<b>Q9 Hearing reasons</b>	<p>HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.</p>
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP854
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>The policy seeks 30% affordable housing on greenfield sites, 15% on low value brownfield and 25% on high value brownfield. HBF would question if this policy is deliverable and viable.</p> <p>A Whole Plan Viability Assessment has been undertaken by Porter Pe. The report dated July 2024 is document reference ED004 of the supporting evidence of the Plan.</p> <p>HBF question whether the viability assessment has fully considered all the relevant costs that will impact on development viability. For example, HBF information suggests that complying with the current new part L is costing £3500 per plot. The Future Homes Standard Part L in 2025 is anticipated to cost up to £7500+ per plot. There will also be the addition of the Building Safety Levy that is coming in pay for cladding. This will be a per plot basis around the UK, and initial values are around £1500- £2500 per plot.</p> <p>Other factors that need to be taken into account include increasing costs of materials and labour due to inflation and the fact that the cost of living crisis has also impacted the housing market making borrowing more expensive for potential future purchasers. HBF suggest these changes may not be limited to only the short term but are likely to also mid to longer term impacts.</p> <p>Another key cost relates to BNG. The costs of mandatory BNG are still emerging as the off-site market is yet to be established. Although the initial price of statutory credits is now known this national fallback option has been deliberately highly priced to discourage their use. Whilst this intention is understandable, at present the lack of functioning local markets for off-site credits causes viability problems because HBF members experience to date suggests that any scheme that needed to rely on statutory credits would become unviable.</p> <p>Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable, and therefore flexibility in the amount of affordable housing sought may be needed to deal with site specific issues.</p> <p>At a very basic level viability can be improved by reducing costs or increasing values. Sometimes, therefore changing the type of affordable housing provided can help to improve viability of a specific site, and the plan should recognise this. Greater flexibility within the Affordable Housing policy is needed.</p> <p>HBF would again question if any reference to Frist Homes is appropriate, justified or effective as this is no longer a kind of affordable housing supported by the Government.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.</p>
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP858
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann

<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>Section 106 contributions can only be sought to ensure a development mitigates its own impact. They cannot be required to address existing shortfalls. It will therefore be essential for the Council to have robust and up-to-date evidence and calculate any developer contributions arising at the time a planning application is made. It will be important that the CIL tests for s106 requests are considered at the decision-making stage, and the policy should make this clear.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP862
<b>Order</b>	255
<b>Title</b>	Appendix 1: Monitoring Framework
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>Policy Omission: Monitoring and Review</p> <p>The Plan is not considered to be sound as it is not justified or effective or in line with national policy</p> <p>The Plan is unsound because HBF as it does not contain a clear plan for monitoring its delivery and taking effective action if under delivery of housing is observed. Monitoring is an essential part of the plan monitor manage approach.</p> <p>However, HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.</p> <p>HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. HBF recommends that the Council provide more details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP822
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)

<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not in line with national policy.</p> <p>HBF note the Government's intention to move away from First Homes as a type of affordable housing. HBF question if the policy needs updating to reflect this new national policy.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP816
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.3
<b>Q6 Details</b>	<p>Please see attached representations. HBF are unclear if the duty to cooperate has been met</p> <p>From the information available we do not know if there has been discussion about any requirement to meet unmet need of a neighbour, or if indeed the housing standard method calculation includes any allowance for this. We therefore cannot tell if the Duty to Cooperate has been met. It is surprising there is no mention of the Duty to Cooperate, unmet housing need or neighbouring authorities within the Plan itself. More information is needed for the plan to be effective and fully justified. Compliance with the Duty to Cooperate is also an essential part of effective plan-making and national policy.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP820
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>As mentioned previously HBF do not comment on individual site allocations, we would expect that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. HBF notes that the location of windfall sites, is by definition, currently unknown as such question if there is a potential tension between relying on windfall sites as part of the Housing Land Supply and restricting development in rural areas. Similarly,</p>

	<p>brownfield sites within the Green Belt (and potentially new grey belt sites) are another example of sites that may be brought forward that the Council may wish to support being redeveloped.</p> <p>It is therefore essential that the statement in the supporting text of the Plan as para 5.12 that the spatial distribution figures are not a ceiling is applied in practice. However, that sentence continues to explain that the spatial distribution is not a target either. We are therefore unclear how this would be monitored and what actions would be taken if development was not coming forward in line with the spatial distribution expected.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP856
<b>Order</b>	50
<b>Title</b>	Policy HOU5: Specialist Needs Housing
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU5
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy. HBF comments in relation to accessibility requirement set out in HOU3 are set out in response to that policy. They are not repeated here. HBF would request the removal of criteria 3 from this policy. Particularly in relation to specialist housing, this issue is already fully addressed through Building Regulations.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP860
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy. HBF objects to any requirement for applicants to have to assess or demonstrate the capacity of the water company to connect a development with water services (e.g. the supply of fresh water and the treatment of wastewater).</p> <p>This is not a land use planning matter. This matter is managed under a separate statutory regime. Matters relating to water and sewerage infrastructure and its availability and/or network capacity are both controlled by separate, dedicated legislation, i.e., s37 (water) and s94 (sewerage) of the Water Industry Act 1991. Second, the planning process should not be used as a route to subjugate established primary legislation.</p>

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Repls.pdf</a>
<b>Comment ID</b>	NULLP817
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>Housing Requirement- dpa and total</p> <p>Although HBF supports the principle of the Council planning for a higher housing number than is required by the standard method, we do not believe sufficient explanation has been provided in the plan as to how the proposed housing requirement in the Plan has been arrived at.</p> <p>We note that the supporting text states that the standard method calculation for Newcastle-under Lyme results in 6,490, an annual requirement of 347 dwellings per annum. However, further explanation and clarity on the standard method calculation is needed to explain and justify the figure that has been used. For example, setting out the date of the standard method being used and which affordability ratio has been applied. Similarly, it is unclear from the Plan whether the standard method calculation included any element of meeting the unmet needs of a neighbouring authority, or not. HBF believes this information should be clearly set out within the Plan in supporting text and not relegated to a different document (topic paper, background document etc.).</p> <p>HBF support the Council's view that as the HEDNA identifies a need to deliver 8,000 homes to 2040 this justifies going above the standard method figure, but we would suggest there may be other reasons that justify going further still.</p> <p>In our Reg 18 response HBF requested that the Council plan for a higher number of houses for a variety of reasons including supporting economic growth, the need to provide for a range and choice of sites, the need for a non-delivery buffer, the need to plan for small sites to ensure delivery across the plan period and a robust five-year housing land supply and housing trajectory. We therefore support the principle of the higher figure but ask for more information on how it has been arrived at, what other factors were considered, and if and why they were discounted.</p> <p>HBF notes that Paragraphs 9 and 10 of the HNA (2020) concluded that a higher growth scenario of 410-445 dwellings per annum is 'robust and justified'. This is less than is currently being planned for.</p> <p>HBF agree that Government's standard methodology identifies the minimum annual LHN, which is only a minimum starting point, and not the housing requirement figure, and support the Council's efforts to deliver more housing than the minimum LHN. We in particular welcome the clarification that the housing requirement in the policy is a minimum figure, a change we requested at Reg 18 stage. The wording for this part of the policy is now in line with national guidance.</p> <p>We therefore welcome the increase to 8,000 new homes over the Plan period, and the consequential increase in annual housing requirement to 400 dwelling per hectare, but without understanding how the figures have been arrived at it is difficult to conclude if this uplift is sufficient or not to deliver the objectives of economic growth which the Council is seeking to achieve, and the HBF supports.</p> <p>As mentioned above, HBF would request the Plan period is extended to ensure a 15-year post-adoption period. This would further increase the housing requirement.</p> <p>Buffer and Windfall</p> <p>As the NPPF sets out the supply of specific deliverable sites should include a buffer of 5% to ensure choice and competition in the market. HBF support the delivery of this 5% through allocations in the Local Plan because this is the best way to provide certainty for developers whilst also enabling choice and competition within the land market. Indeed , where there has been significant under-delivery a buffer of 20% is required.</p> <p>Para 5.4 of this draft plan explains that "It is important that there is resilience in housing supply taking account of factors that may affect delivery and to ensure the overall housing requirement is delivered during the plan period. To address this, the Plan makes provision for a supply buffer of circa 8.3% above the housing requirement set out in this policy". Whilst HBF fully supports the inclusion of a buffer, we are unclear why the Council has chosen a buffer of 8.3% and therefore question if this is effective and justified.</p> <p>Table 2 sets out calculations that arrives at a figure of 8,663 homes which is called in the table "Total Supply of Housing plus buffer". It is therefore unclear of the level of buffer being planned for is a 'policy choice' or the result of residual calculation of housing supply compared to requirement.</p>

	<p>HBF remain of the view than any allowance for windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market.</p> <p>The Government has made it clear that it still supports the national target of 300,000 new homes per year. In the midst of a housing crisis and in light in the level of high housing need in HBF are pleased to see that the Council is following the requirements of the NPPF and setting their housing requirement using the standard method as minimum starting point, and planning for an increased number of homes to support economic growth. However, but for the Plan to be sound the Council needs to demonstrate it has considered the other factors which may further increase the housing requirements, including any factors raised under the Duty to Cooperate and/or unmet needs of neighbouring authorities and the wider West Midlands region.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP849
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not in line with national policy.</p> <p>It is important for the difference between a Health Impact Assessment screening and a full Health Impact Assessment is explained in the Plan.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP853
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>Again, HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.</p> <p>HBF note that it is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The policy requirements to provide an energy statement which demonstrates</p>



	<p>the maximum feasible and viable use of onsite renewable energy generation for at least 10% of their energy needs from renewable or low carbon energy generation, is unified and may be ineffective.</p> <p>The development industry is working to address this matter at a national level through Building Regulations and the Future Home Standard. A Local Plan policy on this issue may therefore be unintentionally counterproductive, and undermine climate change adaptations and mitigations.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP857
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU6
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders-although this would need to be done through discussion and negotiation with landowners.</p> <p>HBF consider it is unlikely that the provision of self and custom build plots on major residential development schemes can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. HBF also question is there is a mismatch between the kind of plots and locations that self-builders are looking for, and the kind of plots that would result from this policy. The issue of self and custom build plots is therefore not only one of viability but also deliverability and desirability to the self build and custom build plot market.</p> <p>Although HBF does not support the requirement for self build plots on allocated sites if they are to be required then HBF welcomes the Council's realistic policy approach to ensure that where self and custom build plots are provided, they are delivered and do not remain unsold. HBF agree that it is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.</p> <p>There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self and custom builders. HBF therefore strongly support a self-build policy that does make it clear that unsold plots remaining after a certain period would revert back to becoming open market housing but HBF suggest this should be after six months, not one year</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP861
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	Home Builders Federation

<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>HBF note the introduction of Biodiversity Net Gain which came in for large sites on Feb 12th 2024, and for small sites from 2nd April 2024. In order for the plan to be sound it will be important for this policy to fully reflect all the new legislation, national policy and DLUHC and DEFRA guidance.</p> <p>HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time, including feeding into the BNG Planning Practice Guidance from DLUHC and the DEFRA BNG Guidance. HBF note that this represents a lot of new information that the Council will need work though and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance now it has been published. It should also be noted that</p> <p>the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance.</p> <p>It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% biodiversity net gain as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure, rather than the policy including the phrase "at least 10%" would help to provide this.</p> <p>It is also important to note that for large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase. Additional advice on phased development has been provided in the new BNG PPG.</p> <p>The wording of the first criteria of the policy is inaccurate as there are some exemptions to BNG requirements that could mean for example a new self-build house is not required to provide BNG.</p> <p>The characterisation of the BNG hierarchy is criteria 3 is also not quite right. The hierarchy in on-site units, then off-site units, then statutory credits (not onsite, then onsite and offsite and then statutory credits).</p> <p>There may also be circumstances where off-site BNG provision is preferred This could include for example, whether the site is suitable for the type of BNG to be provided, what the priorities of the Local Nature Recovery Strategy are and/or the opportunity to coordinate contributions from a range of sites to provide for large landscape scale BNG schemes. The metric already compensates for off-site BNG provided when this is provided further away from the site, by requiring more of it to be provided.</p> <p>Our comments about the costs and viability implications of BNG are set out in our response to the Housing Chapter, and not repeated here, other than to highlight that the costs of BNG must also be considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery. The costs relate both the financial costs and also land take- which will impact on densities achievable if BNG is provided on site.</p> <p>HBF would also encourage the Council to ensure the Local Plan fully considers the new BNG requirements in relation to site allocations. This is likely to require undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the BNG costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks. The Plan should include reference to this within the supporting text.</p> <p>Reference could also usefully be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy has applied to small sites since April 2024.</p> <p>BNG will also impacts on the density of housing schemes that can be provided, as land used for on-site BNG is not available for housing. This may require larger and/or additional housing sites to be allocated.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reprs.pdf</a>
<b>Comment ID</b>	NULLP815
<b>Order</b>	21

<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations.HBF welcomes the Council's efforts to ensure that they have an up to Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. HBF agree that there are many factors that support the need for a new Local Plan for Newcastle-under-Lyme. However, HBF note that the Plan Period runs only to 2040. Para 22 of the NPPF requires that 'strategic policies should look ahead over a minimum 15-year period from adoption'.</p> <p>Although we note that the Plan is now at Reg 19 submission stage, it can and does take time to proceed through the remaining stages of plan preparation- the examination process, main modification consultation, Inspector's report and adoption of the Local Plan. HBF therefore question whether the plan period need extending. Extending the plan period by one or two years and rolling forward the housing requirement to these future years would seem a reasonable approach to address this issue.</p> <p>For this plan to be sound, the plan period needs extending. A plan period of less than 15 years on adoption fails to comply with the NPPF requirements for effective plan making.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP819
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>Although HBF do not comment on individual site allocations, we would expect that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. HBF considers that the Council's proposed approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement.</p> <p>However, the spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.</p> <p>The Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.</p> <p>The NPPF also requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.</p>

	In order to be effective and justified the Plan's policies and evidence base should set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP823
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not in line with national policy.</p> <p>In HBF's view an increased housing requirement (for the reasons listed elsewhere), and the current housing crisis create the exceptional circumstances that justify a full Green Belt review as part of the Newcastle under Lyme Plan.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP851
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy.</p> <p>The first policy criteria sets a requirement to follow the energy hierarchy, but this is not defined in the policy, supporting text, or the Glossary of the Plan .</p> <p>Criteria 3 of this policy seeks to require development to ensure an estimated water consumption of no more than 110 litres/person/day. HBF do not believe such a policy is needed in the Local Plan because current Part G Building Regulations require 125 litres per day, and house builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There is no need for Local Plan policies to repeat Building Regulations and it is in fact unhelpful to do so as Building Regulations may change during the course of the plan period.</p>

	<p>HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.</p> <p>HBF would caution against Criteria 8 and whether it will deliver the climate change benefits the Council are seeking. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.</p> <p>Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers.</p> <p>The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP855
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy. The wording of criteria one of this policy could be open to misinterpretation. HBF are assuming the Council means residential development of homes and not 'residential homes' which many would take to mean specialist housing for the elderly. As such the policy wording should either say all new residential development, or all new homes.</p> <p>HBF do not support the need for Local Plan to include policies to deal with issues that already adequately addressed through Building Regulations. We also do not support the introduction of the optional Nationally Described Space Standard though policies in individual Local Plans.</p> <p>The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.</p> <p>Any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF (para 130f &amp; Footnote 49), which states that "policies may also make use of the NDSS where the need for an internal space standard can be justified". As set</p>



out in the NPPF (para 31), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.

The PPG identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
- Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.

HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council's policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provide a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.

If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

HBF welcomes the fact that the Council have sought to differentiate between Part a) and part b) of M4(3) technical standards. M4(3)a sets out standards for wheelchair adaptable housing, where M4(3)b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. We would also question whether the viability implications of this policy have been fully considered.

HBF is unclear if this matter has been accurately and fully considered in the Whole Plan Viability Assessment. There are cost implications resulting from any requirements for the provision of M43a and/or M43b requirements as both M4(3) and M4(3)b impact on viability, with M4(3)b being considerably more expensive. HBF information suggests M4(3)b is at least ten times more expensive than M4(3)a.

HBF also note that the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy.

The PPG states:

"What accessibility standards can local planning authorities require from new development?

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement'.

Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied."

The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings. Such factors include flooding, topography and other circumstances. HBF suggest that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this. HBF do not believe this policy is sound without this flexibility, as it fails to comply with national policy and is not effective or justified.

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP859



<b>Order</b>	98
<b>Title</b>	Policy IN7 Utilities
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>The Policy is not considered to be sound as it is not justified or effective or in line with national policy. HBF objects to any requirement for applicants to have to assess or demonstrate the capacity of the water company to connect a development with water services (e.g. the supply of fresh water and the treatment of wastewater).</p> <p>This is not a land use planning matter. This matter is managed under a separate statutory regime. Matters relating to water and sewerage infrastructure and its availability and/or network capacity are both controlled by separate, dedicated legislation, i.e., s37 (water) and s94 (sewerage) of the Water Industry Act 1991. Second, the planning process should not be used as a route to subjugate established primary legislation.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>
<b>Comment ID</b>	NULLP863
<b>Order</b>	267
<b>Title</b>	Appendix 6: Indicative Housing Trajectory
<b>Consultee Company / Organisation</b>	Home Builders Federation
<b>Consultee Position</b>	Planning Manager - Local Plans (Midland and South West)
<b>Consultee Family Name</b>	Danemann
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>Although HBF welcomes the inclusion of a Housing Trajectory in the Plan, as one was not included at Reg 18, we would request further detail is provided to ensure that the Plan is effective and fully justified. A site by site breakdown should be provided. To be both justified and effective the Housing Trajectory should also include break down the housing numbers into different sources of supply. This is essential to enable effective monitoring.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	HBF requests to participate in the Hearing Sessions for the Local Plan Examination, the HBF considers that their involvement is necessary to ensure that the home building industry is able to respond to any housing related issues raised during the hearing sessions.
<b>Attachments</b>	<a href="#">1341948 HBF Reps.pdf</a>

<b>Comment ID</b>	NULLP157
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Darlington
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Concerns over unsound policy for AB2</p> <p>Legality</p> <ul style="list-style-type: none"> <li>The green belt site review consolidated report 16 July 2024 RECOMMENDS EXCLUSION OF THE SITE FROM PROCESS (table 17, page 28) In addition Staffs County Council in the "vision enterprise CIC Audley Parish Green Belt" judged that the Audley Green Belt contributed strongly in safeguarding the encroachment of urbanisation. (Green belt review V2.4 August 22) These findings have been ignored.</li> </ul> <p>Proposed access to site AB2 is extremely problematical</p> <ul style="list-style-type: none"> <li>Option 1. Breaking into an already busy M6 junction 16 roundabout interchange will have a direct impact on the A500 and access on and off the M6. Daily traffic queues are already an issue at this junction.</li> <li>Option 2</li> </ul> <p>Creating access to AB2 via the north bound carriageway of A500 where an existing lay-by is situated.</p> <ul style="list-style-type: none"> <li>This possible access point is cutting into the A500 where regularly traffic is queuing.</li> <li>It will force any southbound traffic to cross over the A500 carriageway via the Audley/Alsager interchange using a country road over a small bridge which is completely unsuitable for any large vehicles.</li> <li>M6 northbound commercial vehicles may be tempted to exit the motorway at junction 15 travelling north on the A500 to reach the site. This will add to already high congestion through the city of Stoke on Trent.</li> <li>Emergency access roads to AB2 site proposed off Park Lane. Is this feasible or Safe for such a narrow country lane since Park Lane is a single cars width lane with passing places and no pavement or street lighting. Widening would impact on a greater area outside the AB2 Site.</li> <li>Inevitable Park Lane would be used as access for workers to the site. If the lane became any busier than it already is it would become unsafe for residents, ramblers, dog walkers, local running club, horse riders (livery stables sited at Park End, Park Lane) , bird watchers, families with bikes and prams who use it regularly. Dairy cattle have to cross Park Lane from field to farm for milking as well.</li> <li>Regarding Accessibility for workers at AB2, there is currently no bus or rail link. The site is isolated from both transport and amenities ie shops. It is Impossible to walk or cycle there using the designated access off A500 (would mean walking/cycling along a very busy dual carriageway with no pavements) around junction 16. Comes back to using Park Lane as an access point for the site.</li> </ul> <p>Economic concerns</p> <ul style="list-style-type: none"> <li>How much employment will 'big box' warehousing generate? Very little in ratio to the size of the development. It's also a majority of unskilled low pay work, so its capacity to generate wealth and income to the borough is low compared to its adverse effect which includes:-</li> <li>1.Loss of prime agricultural land. 2.loss of hedgerows and manipulation of natural topography. 3.visual, noise, light, air pollution. 4.impact on residents living against the site. 5.flooding(AB2 is currently 100% fields this will be changed to hard surfaces causing run off) 6.loss of biodiversity</li> <li>7.Economic impact on alternative development sites ie Chatterley Valley and Roadway Green which are currently already under construction. Investing in a rural green belt removes the investment/regeneration of the "Potteries" aged industry sites 8.impact on local/rural economy, food production and farm employment. 9.Net carbon claim does not allow for workers having to travel to site by car which is the only means of viable transport at present.</li> <li>80 hectares of Green belt land to be lost to AB2 for only 22hectares of employment land. How can this ratio be justified when virgin farm land under green belt status is to be lost. There is a deficit in agricultural production compared to population and loosing more food production land only increases the problem. AB2 IS NOT A GREY FIELD SITE, it is top quality agricultural land.</li> </ul>

	<ul style="list-style-type: none"> <li>If the 80 hectare development goes ahead as planned at AB2 this will result in 40% over and above the required needs identified in the local plan for employment land within the borough. There are 4 farms involved in selling land for this site is this necessary?</li> </ul> <p>Personal impact</p> <ul style="list-style-type: none"> <li>In particular there are 3 family homes ( Lane, Park and Brook Cottages) which AB2 boundary directly abuts to on 3 sides, placing all the houses in a ransom strip. See below map. Also a proposed emergency access to AB2 lies immediately against these properties. I urge extra consideration in planning, even with natural screening these properties will be greatly affected and the residents should be given an option for compensation or compulsory purchase. It would not be unreasonable to ask any planning officer to visit this particular site.</li> </ul> <p>Economic viability of developing AB2.</p> <ul style="list-style-type: none"> <li>The not insignificant cost of creating access to the site off the A500</li> <li>There is also a mains gas pipeline that crosses the site would this require moving before building went ahead? Also Fowl water Drainage/soak aways from lane,Brook and Park cottages exist on the site</li> </ul>
<b>Q7 Modification</b>	site should be removed from local plan as totally not suitable
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP158
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Darlington
<b>Consultee Given Name</b>	Jennifer
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Concerns over unsound policy for AB2</p> <p>Legality</p> <ul style="list-style-type: none"> <li>The green belt site review consolidated report 16 July 2024 RECOMMENDS EXCLUSION OF THE SITE FROM PROCESS (table 17, page 28) In addition Staffs County Council in the "vision enterprise CIC Audley Parish Green Belt" judged that the Audley Green Belt contributed strongly in safeguarding the encroachment of urbanisation. (Green belt review V2.4 August 22) These findings have been ignored.</li> </ul> <p>Proposed access to site AB2 is extremely problematical</p> <ul style="list-style-type: none"> <li>Option 1. Breaking into an already busy M6 junction 16 roundabout interchange will have a direct impact on the A500 and access on and off the M6. Daily traffic queues are already an issue at this junction.</li> <li>Option 2</li> </ul> <p>Creating access to AB2 via the north bound carriageway of A500 where an existing lay-by is situated.</p> <ul style="list-style-type: none"> <li>This possible access point is cutting into the A500 where regularly traffic is queuing.</li> <li>It will force any southbound traffic to cross over the A500 carriageway via the Audley/Alsager interchange using a country road over a small bridge which is completely unsuitable for any large vehicles.</li> <li>M6 northbound commercial vehicles may be tempted to exit the motorway at junction 15 travelling north on the A500 to reach the site. This will add to already high congestion through the city of Stoke on Trent.</li> <li>Emergency access roads to AB2 site proposed off Park Lane. Is this feasible or Safe for such a narrow country lane since Park Lane is a single cars width lane with passing places and no pavement or street lighting. Widening would impact on a greater area outside the AB2 Site.</li> <li>Inevitable Park Lane would be used as access for workers to the site. If the lane became any busier than it already is it would become unsafe for residents, ramblers, dog walkers, local running club, horse riders (livery stables sited at Park End, Park Lane) , bird watchers, families with bikes and prams who use it regularly. Dairy cattle have to cross Park Lane from field to farm for milking as well.</li> <li>Regarding Accessibility for workers at AB2, there is currently no bus or rail link. The site is isolated from both transport and amenities ie shops. It is Impossible to walk or cycle there using the designated access off A500 (would mean walking/cycling along a very busy dual carriageway with no pavements) around junction 16. Comes back to using Park Lane as an access point for the site.</li> </ul> <p>Economic concerns</p> <ul style="list-style-type: none"> <li>How much employment will 'big box' warehousing generate? Very little in ratio to the size of the development. It's also a majority of unskilled low pay work, so its capacity to generate wealth and income to the borough is low compared to its adverse effect which includes:-</li> <li>1.Loss of prime agricultural land. 2.loss of hedgerows and manipulation of natural topography. 3.visual, noise, light, air pollution. 4.impact on residents living against the site. 5.flooding(AB2 is currently 100% fields this will be changed to hard surfaces causing run off) 6.loss of biodiversity</li> <li>7.Economic impact on alternative development sites ie Chatterley Valley and Roadway Green which are currently already under construction. Investing in a rural green belt removes the investment/regeneration of the "Potteries" aged industry sites 8.impact on local/rural economy, food production and farm employment. 9.Net carbon claim does not allow for workers having to travel to site by car which is the only means of viable transport at present.</li> <li>80 hectares of Green belt land to be lost to AB2 for only 22hectares of employment land. How can this ratio be justified when virgin farm land under green belt status is to be lost. There is a deficit in agricultural production compared to population and loosing more food production land only increases the problem. AB2 IS NOT A GREY FIELD SITE, it is top quality agricultural land.</li> </ul>

	<ul style="list-style-type: none"> <li>If the 80 hectare development goes ahead as planned at AB2 this will result in 40% over and above the required needs identified in the local plan for employment land within the borough. There are 4 farms involved in selling land for this site is this necessary?</li> </ul> <p>Personal impact</p> <ul style="list-style-type: none"> <li>In particular there are 3 family homes ( Lane, Park and Brook Cottages) which AB2 boundary directly abuts to on 3 sides, placing all the houses in a ransom strip. See below map. Also a proposed emergency access to AB2 lies immediately against these properties. I urge extra consideration in planning, even with natural screening these properties will be greatly affected and the residents should be given an option for compensation or compulsory purchase. It would not be unreasonable to ask any planning officer to visit this particular site.</li> </ul> <p>Economic viability of developing AB2.</p> <ul style="list-style-type: none"> <li>The not insignificant cost of creating access to the site off the A500</li> <li>There is also a mains gas pipeline that crosses the site would this require moving before building went ahead? Also Fowl water Drainage/soak aways from lane,Brook and Park cottages exist on the site</li> </ul>
<b>Q7 Modification</b>	For reasons listed above the AB2 site should be removed from the plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6384966
<b>Attachments</b>	<a href="#">IMG_5113.jpeg (1)</a>

Darlington, Paul

<b>Comment ID</b>	NULLP1
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Darlington
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The policy says that a that a safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction will be established from the A500 with emergency access via Barthomley Road.</p> <p>However the A500 is already very congested with traffic from the A500 accessing Jn16 and Barthomley Road is a narrow single carriageway and is unsuitable for emergency access. I therefore consider that the proposal is not sound.</p>
<b>Q7 Modification</b>	The Audley employment site will need far better access for the proposal to be sound
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP1382
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Lee
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1440
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Lee
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments Congested Local Roads Concerned about insufficient amount of high schools in the local area</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1137
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Margaret
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB2 not realistic as Junc 16 &amp; M6 a500 us inadequate with many current problems (see 4/5 accident data analysis) Proposed to remove 80 hectares of good quality agricultural land/ Green Belt, for 22 hectares of employment land, with as yet unspecified use. JOBS, not predictable employment figures and uncertainty resource of work force, whether applicable to local plan requirement for employment area.</p> <p>Emergency access proposals park lane is many 1 track and would require a site visit to appreciate the impossibility of this suggestion.</p> <p>Provision of Lorry Park &amp; associated facilities to replace short lay by is unnecessary and intrusive are other truck stops on enclosed proximity, Crewe 7/8 miles with 365/ 24 hour service. ADS truck stop Longton 12 miles &amp; Lymm 29</p> <p>AB2 surplus to requirement as many units are neighboring sites are as vacant units, 8 advertised at present time at Radway Green.</p> <p>Sustainable travel requirements not met as no direct access to site and no long time plans in place.</p> <p>Huge traffic impact on surrounding area (see 4/5)</p>

<b>Comment ID</b>	NULLP1439
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments Concerned about insufficient high schools after attending open evenings Overcrowded local roads</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1380
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be</p>



	<p>seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1367
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Robert William
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1419
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Robert William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Is there going to a food infrastructure on this projects like we were promised on waterhayes estate, which never happened. Rat run for Red Street sewers out of date cannot cope now clinics shops schools dentists this time please, not just new houses.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1313
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Davies
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is not adequate. These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p> <p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another'</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p>

The Proforma for CT1A also states that *“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”* In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, St.Chad's, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

I live right by the entrance to St.Chad's school, and see dangerous driving, illegal parking and children's and adults lives put at risk every single day, the road narrows to single file due to vehicle parking on both sides of the road, the traffic often comes to a standstill, and as mentioned, the increase of potentially over 1000 more vehicles trying to get through will be absolutely horrendous. This will also increase pollution in the local area.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.



The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s. Again, this will mean any traffic going to the schools from the new development will need to pass through the narrow Red Street village, which as mentioned, is already a bottleneck.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:**

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.

**Additional Comments:**

My Previously submitted comments from 21/09/23, submission ref id 241106, are below:

"Dear Sir/Madam,

This email is to confirm my objection to plans to potentially build housing and commercial property within the area of Red Street and Talke, specifically, but not limited to, areas CT1 and TK30.

Looking at the maps in the Local Plan, it would mean continuous housing all the way from Newcastle to Kidsgrove.

In previous Local Plans, Newcastle Borough Council have said they would avoid "urban sprawl", so has this policy now changed?

It feels like every inch of green space is being turned into housing, and brown sites seem to be too much trouble to build on.

As an example, work started on housing on London Road Chesterton, near to the mini roundabout by Holditch Road, many years ago and was abandoned. How many other areas are like this? I have passed numerous sites where derelict buildings have been standing for years, these are in a very poor condition so why not use this land?

**Traffic:**

I have lived (redacted by admin) in Red Street since 2007, residents have to park on both sides of the road through Red Street, resulting in traffic being narrowed to single file through this stretch. The traffic is often at a standstill, especially during school time, and this is also a major bus route.

There are also major issues whenever accidents happen on the M6, A500 or A34 as people then attempt to use Red Street as a "rat run" causing yet more congestion.

Building over 1,000 houses on CT1 and TK30 would be devastating for the area, potentially meaning an extra (at least) 2,000 more vehicles on the already narrow roads through Dean's Lane and Red Street/ Crackley Bank.

This increase in traffic will obviously increase both noise and air pollution.

**Amenities:**

There are already major problems signing up with dentists and doctors in the area, and there aren't any at all in Red Street, so by adding over 1,000 houses, (potentially over 3,000 people assuming 3x people per house) where will these people go?

There are no shops here, only a butchers.

There is one primary school, St.Chads, which I believe is always at full capacity. The nearest other schools are in Chesterton and Talke, which I also believe are at full capacity. So where will these new younger residents go to school?

**Wildlife:**

Within the local green spaces we have been enjoying for many years, we are very lucky to have a rich variety of wildlife including bats, hedgehogs, foxes, numerous birds of prey, skylarks, swallows, owls, rabbits, badgers etc. Building on these areas will have a devastating effect on this wildlife.

**Mining & subsidence:**

Both CT1 and TK30 have had major mine workings over the last few hundred years, much of which is not mapped. Collapsed workings and holes regularly appear in these fields. By building on these areas, it could have a knock on effect on nearby properties, potentially causing subsidence.

There is also the question of water drainage, especially on CT1, as it will cause more flooding issues at the A500/A34 roundabout.

In summary, CT1 and TK30 are both huge areas of existing green space, home to such a wide variety of wildlife.

Red Street and the immediate areas are simply not suitable for such a large housing estate, please reconsider these inappropriate building plans.

The government have stated the housing requirements have fallen, this should also be honoured by the local borough councils.

<b>Comment ID</b>	NULLP692
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Deacon
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Objection to site AB2 on the map</p> <p>We consider that this part of the plan is</p> <p>NOT legally compliant</p> <p>NOT sound</p> <p>NOT compliant with Duty to Co-operate</p> <p>For the following reasons</p> <ul style="list-style-type: none"> <li>• Undue consideration has been given to how traffic will reach the site. The main route to site will result in the loss of a layby from the A500, which is a safety concern. The section of the A500 between Audley and junction 16 comes to a standstill if there is an accident on the M6. Traffic often diverts through Audley in these cases which causes issues with traffic flow on the roads. This will be worse still if HGVs and 3000 employees are diverting through the village.</li> <li>• If people from the borough are employed on the site, this will increase traffic through the village and surrounding routes to reach the site (there is no public transport or cycle paths to the site).</li> <li>• The roads in the village are narrow Victorian roads with cars parked on road, it is often grid locked at rush hour. The roads will be unpassable if HGVs and 1000s of workers are also using the roads.</li> <li>• The emergency exits to the site are to be on Park Lane and Barthomley Road. Both single track roads with no pavements. How will they stop workers and others from using these roads which cannot cope with much traffic. An example of this is the service slip roads off the Knutsford M6 junction used extensively and unlawfully by residents.</li> <li>• Lack of consideration for the environment and climate change. The land being proposed is good quality agricultural land and wildlife habitat. The land is currently a good carbon store whilst the development will increase carbon emissions.</li> <li>• The employment created will be low skilled, low paid jobs, which will be under threat from future automation. High skilled, high paid jobs would be more beneficial to residents of the borough.</li> <li>• Jobs won't necessarily be for local people as the site is commutable from as far away as Manchester and Birmingham.</li> <li>• The site is in the green belt and will mean a huge loss of countryside.</li> <li>• The site is isolated and disconnected from the local villages and the towns of Newcastle and Kidsgrove creating an urban blot on the landscape.</li> </ul>
<b>Comment ID</b>	NULLP572
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Deacon
<b>Consultee Given Name</b>	Sarah
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Objection to site AB33 on the map</p> <p>We consider that this part of the plan is</p> <p>NOT legally compliant</p> <p>NOT sound</p> <p>NOT compliant with Duty to Co-operate</p> <p>For the following reasons</p> <ul style="list-style-type: none"> <li>• The population of the borough is falling so the housing numbers cannot be justified.</li> <li>• Housebuilding has exceeded the increase in households over the past 10 years in the borough.</li> </ul>

- The emphasis should be on developing brownfield sites and empty town centre buildings rather than using greenbelt land.
- Park Lane floods and has been underwater for 6 months of the year, which indicates a lack of foresight in planning
- Building more houses will increase the risk of flooding
- Park Lane site was a working farm which the council has allowed to fall into a state of disrepair denying local families the opportunity to run a small holding
- Concern about access to the site and safety, Park Lane is a single track road with no pavements
- Audley Parish has narrow Victorian roads with on road parking in most streets. Traffic flow and parking issues will continue to increase if more traffic on these roads
- GP surgery is over subscribed and difficult to get appointments. This will get worse if more people living in the village.
- Schools are over subscribed and have poor facilities, which will get worse with more pupils.

<b>Comment ID</b>	NULLP24
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Dennis
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Further qualifying objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End AB12</p> <p>Dear Cllr Andrew Fear (Planning Policy Manager).</p> <p>Further to my earlier report (dated 16th August 2024), outlining my objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End (AB12), I wish to add further concerns/ objections which appear to be borne out by an 'independent' Consulting Company by the name of:</p> <p>LEPUS Consulting Landscape, Ecology, Planning &amp; Urban Sustainability</p> <p>I have since read the following reports by themselves entitled: Newcastle-under-Lyme Publication Draft Local Plan 2020-2040 Regulation 19 Habitats Regulations Assessment and Sustainability Appraisal of the Newcastle-under-Lyme Local Plan 2020-2040 Reports Dated July 2024</p> <p>Amongst the many pages of plans, tables, reports etc, I have 'sorted' out the 'wheat from the chaff' having decided, without too much partiality in this case, and my objections, and the rationale behind my reasoning, are extremely important in this case.</p> <p>I bring to everyone's attention the following:</p> <p>Air pollution:</p> <p>Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides).</p> <p>Does the Local Plan give rise to emissions which are likely to reach a European site?</p> <p>The Local Plan will trigger housing and employment development and as such increase traffic related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary. Campman and Kite (2021) note that 'this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario'. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is acknowledged that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network.</p> <p>Are the qualifying features of sites within 200m of a road sensitive to air pollution?</p> <p>It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance.</p> <p>Habitat Regulations Assessment (HRA)</p> <p>The Precautionary Principle</p> <p>The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered". The Precautionary Principle is embedded in the Integrity Test.</p> <p>Summary of potential impacts of the Local Plan</p> <p>Increased carbon emissions — The proposed development of 8,000 dwellings (125 dwellings re AB12) and employment floorspace within the Local Plan will be likely to increase to some extent local carbon emissions through energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. This impact will be expected to contribute towards the causes of climate change and secondary effects like sea level rise and extreme weather events.</p> <p>Exposure to air / noise pollution (from AQMAs / main roads)</p> <p>The long-term health of residents, in particular vulnerable groups including children and the elderly can be affected by local reductions in air quality. Development within 200m of an AQMA or main road may expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health. (Although Bignall End is not an AQMA I have already pointed out the potential of a substantial increase in NO2, within the Albert Street/Edward Street/Diglake Street 'Micro-Climate, due the increase in vehicular traffic should the development proceed in this case).</p> <p>Loss of tranquillity</p> <p>Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. The introduction of both noise and night-time lighting through new development is likely to reduce tranquillity in some locations. (As detailed. Offsite issues will need to be addressed and one 'suggestion' has been to provide a parking area for local residents' in the NorthWest corner of the site. So ultimately the current residents' would be expected to live next door to a 24/7 car park and put up with the continual slamming of doors at all times of the day and night? I would suggest that this</p>

	<p>would ultimately cause severe mental illness due to the loss of tranquillity and inability to receive a good night's rest and sleep). PLUS. Has consideration been made as to how much land would be required to provide the residents' parking? A minimum of 40 spaces (individually numbered) would not, in my view, be an excessive number as most homes have 2 vehicles. Electrical charging points? Room for vehicles to enter and leave the parking area along with space to manoeuvre in and out of the parking spaces safely? And how many houses would the developer lose due to this loss of land? It would certainly require a minimum of 10,000 square feet for 40 vehicles. Is the developer willing to pay for it?). This residents' car park will still not, in my view, alleviate, or address, the offsite access issues that will need to be fully addressed with regard to on street parking on Diglake street and the intensification of use of the Diglake St/B5500 junction. Please refer to the attached plan showing the potential for severe noise issues for residents. (Page 6 refers).</p> <p>Increased pressure on local services and facilities</p> <p>The proposed development within the Local Plan is expected to increase population density across Newcastle-under-Lyme. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces.</p> <p>Summary of residual adverse effects</p> <p>Reduction in air quality and increased pollutant emissions</p> <p>Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. The policies would be expected to prevent unacceptable impacts on human health associated with air pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality as a whole. Over time, this adverse impact is likely to be reduced should there (It might as well say that I could end up being rich if I won the lottery! !) be an increase in sustainable transport methods and a phasing out of petrol and diesel-powered cars, alongside other advances in technology. (Unless we all walk everywhere I cannot see this happening).</p> <p>Loss of tranquility</p> <p>The proposed development of 8,000 new dwellings (125 dwellings re AB12) and 63 of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquility of the rural landscape as a consequence of increases in noise and light pollution.</p> <p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase demand on water infrastructure. Although the WCS indicated that Seven Trent Water does not expect water supply infrastructure to be a constraint to development, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in-combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.</p> <p>Identified cumulative effect</p> <p>Reduction in air quality • Increased pollutant emissions</p> <p>The introduction of 8,000 dwellings (125 dwellings re AB12) and employment floorspace under the Local Plan is likely to increase energy demands, congestion and traffic flows with population growth, increasing pollutant emissions, with implications for air quality, residents and biodiversity particularly within proximity to main roads. Overall, the Plan will likely result in a long-term but 'potentially temporary' significant cumulative adverse effect on air quality, which resulting in secondary effects such as the health of residents.</p>
<b>Q10 File 1</b>	6372931
<b>Attachments</b>	<a href="#">1338090 Mark Dennis 3.pdf</a>
<b>Comment ID</b>	NULLP25
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Dennis
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Further (<u>hopefully the last</u>) qualifying objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End</p> <p>AB12</p> <p>Dear Cllr Andrew Fear (Planning Policy Manager).</p> <p>Further to my most recent report (dated 21st August 2024), outlining my objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End (AB12), I wish to add further concerns/ objections as detailed below:</p> <p>Parking suggestions to attempt to 'alleviate' the blatantly problematic offsite access issues regarding the Diglake Street/B5500 (Ravens Lane) Junction.</p> <p>I have also realised that I probably under estimated the square footage required for satisfactory residents' parking should any development proceed. It is more likely to be up to, and possibly in excess of, 15,000 square feet.</p> <p>I am basing this upon APPENDIX 3: Parking Standards detailed within the paragraphs 3.1 to 3.14 refer and primarily pointing out paragraph 3.9 as follows:</p>



Parking bays to be 5 metres x 2.5 metres with a manoeuvring aisle of minimum of minimum width 6 metres unless echelon parking is proposed. Accessible (disability) parking bays should be a minimum of 3.6 metres wide or 2.4 metres wide with a 1.2 metres wide access / transfer area on at least one side of each parking space and at the same level as the space (or 6.6 metres long and at least 2.4 metres wide if in line spaces are provided).

As I have previously stated parking will be required for 40+ vehicles plus disability parking spaces. This car park will also require 3 manoeuvring lanes along with access onto the same. (Please refer to the below picture (Tesco), taken google, showing what is the minimum requirement for residents' parking).

I would also expect this car park to be build to exacting standards and not a simple hard core base of 3 inches followed by 3 inches of tarmac. (The residents' car park should certainly be of a standard to last 20+ years).As the Final Draft Report has detailed this would need to be paid for by the developer and therefore costed by themselves accordingly. (Would they be willing to pay for something that they will never receive any income on and lose land for houses?).

(Map Attachment)

Would it ultimately be cost effective for the developer? And would it really mitigate the offsite issues and intensification of the use of the Diglake Street/B5500 junction?

Policy SE3: Flood Risk Management Final Draft Local Plan

All development should follow the sequential approach to determining the suitability of land for development, direct new development to areas at lowest risk of flooding and where necessary apply the exception test, taking account of all sources of flooding identified in the Strategic Flood Risk Assessment. (Flood Zone 1 — Apparently Low Risk).

`Potential' of flooding

From what I understand, therefore, is that a Flood Risk Assessment (FRA) is required for all development proposals located in Flood Zone 1 on sites of 1 hectare or more. There is obviously a potential of reclassification, from Flood Zone 1, as the North West corner of the proposed development land has already been identified by Utilities Water as susceptible to groundwater flooding. This is borne out by the fact that a resident, who has only built two new homes (backing onto the proposed development) was required, at great cost, to ensure that two holding tanks were also incorporated into their drainage system to prevent damage caused by flash floods running into the fields from his new properties. If this is required for two homes then what will be required for a development of 125 (minus the properties not built due to the 'car park') before United Utilities certify the same?

Loss of tranquillity (Other points that I omitted to mention on my previous reports).

There have been numerous cases, throughout the UK, of individuals purchasing expensive properties, within a village location, which were next to, or nearby to, local churches and village halls. These individuals then went on to complain about their loss of tranquillity due to the church campanologists' practicing too much along with the noise generated from the Scouts/Girl Guides who used the village halls even though the noise was an acceptable, and understandable, consequence of living in the locale. They won their case as their own peace and tranquillity took precedence.

So although peace and tranquillity currently reign within the area of the suggested residents' car parking it would be OK to introduce excessive noise, from the noise generated by revving engines and the slamming of car doors 24/7?

There would also no doubt be a large increase in anti-social behaviour due to non-residents' using the car park as a meeting place to play loud music and deal drugs. (It would seem that this is rather outlandish comment to make but am I wrong?).

Hopefully this will be the last report I make regarding my objections in this case. For your information.

Mark. G. Dennis  
23 August 2024

<b>Q10 File 1</b>	6372945
<b>Attachments</b>	<a href="#">1338090 Mark Dennis 4.pdf</a>
<b>Comment ID</b>	NULLP17
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Dennis
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Further qualifying objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End</p> <p>AB12</p> <p>Dear Cllr Andrew Fear (Planning Policy Manager).</p> <p>Further to my earlier report (dated 16th August 2024), outlining my objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End (AB12), I wish to add further concerns/ objections which appear to be borne out by an `independent' Consulting Company by the name of: LEPUS Consulting</p> <p>Landscape, Ecology, Planning &amp; Urban Sustainability</p> <p>I have since read the following reports by themselves entitled:</p>

Amongst the many pages of plans, tables, reports etc, I have 'sorted' out the 'wheat from the chaff' having decided, without too much partiality in this case, and my objections, and the rationale behind my reasoning, are extremely important in this case.

I bring to everyone's attention the following:

**Air pollution:**

Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at European sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides).

Does the Local Plan give rise to emissions which are likely to reach a European site?

The Local Plan will trigger housing and employment development and as such increase traffic related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a plan boundary. Campman and Kite (2021) note that 'this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario'. This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is acknowledged that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network.

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance.

Habitat Regulations Assessment (HRA)

**The Precautionary Principle**

The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered". The Precautionary Principle is embedded in the Integrity Test.

**Summary of potential impacts of the Local Plan**

Increased carbon emissions — The proposed development of 8,000 dwellings (125 dwellings re AB12) and employment floorspace within the Local Plan will be likely to increase to some extent local carbon emissions through energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions and the production and use of materials during construction. This impact will be expected to contribute towards the causes of climate change and secondary effects like sea level rise and extreme weather events.

Exposure to air / noise pollution (from AQMAs / main roads)

The long-term health of residents, in particular vulnerable groups including children and the elderly can be affected by local reductions in air quality. Development within 200m of an AQMA or main road may expose site end users to increased levels of traffic related air pollution or noise impacts, with adverse implications for health. (Although Bignall End is not an AQMA I have already pointed out the potential of a substantial increase in NO<sub>2</sub>, within the Albert Street/Edward Street/Diglake Street 'Micro-Climate', due the increase in vehicular traffic should the development proceed in this case).

Loss of tranquillity

Rural landscapes are typically tranquil, a valuable attribute that once lost is often irreversible. Darkness at night is one of the key characteristics of rural areas and it represents a major difference between what is rural and what is urban. The introduction of both noise and night-time lighting through new development is likely to reduce tranquillity in some locations. (As detailed. Offsite issues will need to be addressed and one 'suggestion' has been to provide a parking area for local residents' in the NorthWest corner of the site. So ultimately the current residents' would be expected to live next door to a 24/7 car park and put up with the continual slamming of doors at all times of the day and night? I would suggest that this would ultimately cause severe mental illness due to the loss of tranquillity and inability to receive a good night's rest and sleep). PLUS. Has consideration been made as to how much land would be required to provide the residents' parking? A minimum of 40 spaces (individually numbered) would not, in my view, be an excessive number as most homes have 2 vehicles. Electrical charging points? Room for vehicles to enter and leave the parking area along with space to manoeuvre in and out of the parking spaces safely? And how many houses would the developer lose due to this loss of land? It would certainly require a minimum of 10,000 square feet for 40 vehicles. Is the developer willing to pay for it?). This residents' car park will still not, in my view, alleviate, or address, the offsite access issues that will need to be fully addressed with regard to on street parking on Diglake street and the intensification of use of the Diglake St/B5500 junction. Please refer to the attached plan showing the potential for severe noise issues for residents. (Page 6 refers).

Increased pressure on local services and facilities

The proposed development within the Local Plan is expected to increase population density across Newcastle-under-Lyme. This will be likely to apply greater pressures on the capacity of services within the Plan area, including schools, GP surgeries, leisure centres and open spaces.

**Summary of residual adverse effects**

Reduction in air quality and increased pollutant emissions

	<p>Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. The policies would be expected to prevent unacceptable impacts on human health associated with air pollution, but in-combination with the volume of development proposed, there is likely to be a cumulative adverse effect of air quality as a whole. Over time, this adverse impact is likely to be reduced <u>should there</u> (It might as well say that I could end up being rich if I won the lottery! !) be an increase in sustainable transport methods and a <u>phasing out of petrol and diesel-powered cars</u>, alongside other advances in technology. (Unless we all walk everywhere I cannot see this happening).</p> <p>Loss of tranquility</p> <p>The proposed development of 8,000 new dwellings (125 dwellings re AB12) and 63 of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquility of the rural landscape as a consequence of increases in noise and light pollution.</p> <p>Increased demand for water and wastewater management</p> <p>The increased population within the Plan area would be expected to increase demand on water infrastructure. Although the WCS indicated that Seven Trent Water does not expect water supply infrastructure to be a constraint to development, there is potential for a residual adverse effect in regard to wastewater infrastructure when planned growth is considered in-combination with an increase in sewage production and potential for storm overflow events. It is likely that further monitoring and investment to wastewater infrastructure will be required to accommodate development.</p> <p><u>Identified cumulative effect</u></p> <p>Reduction in air quality • Increased pollutant emissions</p> <p>The introduction of 8,000 dwellings (125 dwellings re AB12) and employment floorspace under the Local Plan is likely to increase energy demands, congestion and traffic flows with population growth, increasing pollutant emissions, with implications for air quality, residents and biodiversity particularly within proximity to main roads. Overall, the Plan will likely result in a long-term but 'potentially temporary' significant cumulative adverse effect on air quality, which resulting in secondary effects such as the health of residents.</p>
<b>Q10 File 1</b>	6370882
<b>Attachments</b>	<a href="#">1338090 Mark Dennis 2.pdf</a>
<b>Comment ID</b>	NULLP12
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Dennis
<b>Consultee Given Name</b>	Mark
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Objections regarding the suggested/proposed (Housing) development Diglake Street/Ravens Lane, Bignall End AB12</p> <p>Dear Cllr Andrew Fear (Planning Policy Manager). (I consign the following report to yourself).</p> <p>I have recently had occasion (concentrating primarily on the Diglake Street AB12 proposal) to peruse, commended by yourself, the following: Newcastle-under-Lyme Local Plan 2020-2040 July 2024 Final Draft Newcastle-under-Lyme Borough Council Local Plan (Regulation 19). Having done so I am, even more so, of the opinion that the proposal for the land to be developed will have a most severe detrimental effect upon the mental and physical health of the residents who currently reside in a small side street community. I base my opinions on the following detailed within the 'Final Draft' Report and my observations on the same:</p> <p>Sustainable Environment</p> <p>Policy SE1): Pollution and Air Quality</p> <p>Paragraphs la, lb, lc &amp; ld detail that:</p> <p>Development proposals that are likely to result in detrimental impacts on pollution, including on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. Development proposals should incorporate strategies that prevent or minimise pollution. Development proposals should not lead to significant adverse effects on public health, the environment, or amenity from polluting emissions or odours.</p> <p>Development proposals should not result in negative impacts on air quality within areas designated as Air Quality Management Areas (AQMA), the designation of a new AQMA, or compromise the implementation of the North Staffordshire Local Air Quality Plan and Newcastle-under-Lyme Air Quality Action Plan. (It is accepted that the Diglake Street area is not an AQMA per se).</p> <p>Development proposals should consider the cumulative effects of emissions from proposed development alongside other and existing sources of air pollution in the vicinity.</p> <p>Development proposals should demonstrate that mitigation measures can be achieved to reduce pollution, both during construction and operational phases of development. Measures should prioritise those that directly address air quality concerns, such as: Sustainable and active transport options: This includes promoting walking, cycling, public transport, and reducing the need for travel.</p> <p>Site Allocations</p> <p>Policy AB12 Land East of Diglake Street</p>

Land East of Diglake Street is allocated for residential development for 125 dwellings. Development proposals will be permitted subject to:

Access to the development being via Diglake Street (with emergency access via Raven's Lane / B5500) and pedestrian access provided via Raven's Lane / B5500, Diglake Street and the Albert Street play area.

Provision of a parking area for local residents' in the northwest corner of the site and contributions towards off-site highway improvements necessary to support the development (if required).

Supporting Information. (From the Council's Final Draft Report).

Paragraph 13.26

Primary access to the development should be via Diglake Street and emergency site access provided from Ravens Lane. Pedestrian and cycle access to the site will be via Diglake Street, Ravens Land and Albert Street Play Area. The development will need to address off-site issues relating to on-street parking along Diglake Street and intensification of the use of the junction of Diglake Street and Raven's Lane. Off-site junction improvements may be required, which will be secured through financial contributions. (As mentioned within the paragraph relating to 'local residents parking area' above. How many parking spaces will be provided? Will they be individually numbered? As most of the homes in Diglake Street have two vehicles, and also works vehicles, any 'local residents parking area' would need an extremely large area, reducing the amount of homes that could be built, to alleviate any on-street parking. But this will STILL NOT alleviate the extra vehicular traffic at the Diglake Street/B5500 junction NOR prevent the increase of NO2 emissions).

Paragraph 13.27

The site is located within the Audley Ancient Clay Farmlands Landscape Character Area, which is designated as a high sensitivity landscape. Given the high sensitivity of the landscape, a landscape-led approach to development will be required, to ensure that the layout and design of buildings and structures are appropriate to the landscape setting and a Landscape and Visual Impact Assessment will also be required. (As detailed below).

Paragraph 13.28

Within this area thick, mixed species hedgerows are identified as significant landscape features. There are hedgerows along the north and northwest boundaries of the site, as well as a strong hedgerow that dissects the site in a north-south direction just to the west of its centre. The existing hedgerows will be retained and enhanced. Hedgerow boundaries on the north and north-west of the site will be strengthened and a landscape buffer provided. (Really? It would be naïve in the extreme to believe that any builder would comply with the above. The first thing to go would be the devastation of any hedgerows and other significant landscape feature. By accident of course """)

Paragraph 13.32

The site is located within Flood Zone 1 but some areas within the site are affected by surface water flooding. Two sewers also run through the site adjacent to its western boundary. This will need careful assessment and consideration in the detailed design, master planning and drainage details for the site. Applicants should engage with the relevant provider to consider the detailed design of the site and drainage details. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and local plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk. (Has anyone, who doesn't reside in the area, actually witnessed the occasional flooding, due the drainage being unable to cope, at the bottom of Diglake Street/Edward Street?).

Summary of, and rationale, behind my objections.

The following are, I believe, reasonable comments/objections and my own observations to the proposed development. I therefore report as follows:

Summary of Main Issues Raised (Access)

There are serious concerns over the proposed access arrangements as the secondary access is not appropriate (including concerns over visibility - DANGEROUS).

Highly likely to increase traffic volume in and around Diglake Street. On street car parking is an obvious, as pointed out by the draft report, a severe issue.

The condition of the local road network is an issue.

Staffordshire County Council - The Highway Authority have already raised concerns (First Draft Local Plan Regulation Consultation Report 2024 refers) with the outlined access strategy. They confirm that the site has sufficient road frontage on Diglake Street to create an access however there are offsite access issues that will need to be fully addressed with regard to on street parking on Diglake street and intensification of use of the Diglake St/B5500 junction. Access to the field is presently taken from the (higher order road) B5500, however it is of insufficient width in its current form to serve the proposed development unless it can be improved. Preference would be for the development to be served via the higher order road (B5500). (Due to the current parking issues within Diglake Street the actual width of this road is actually no wider than the Ravens Lane access!).

The council, in replying to these concerns, went on to state that they published a site selection report alongside the First Draft Local Plan. The site selection report detailed the methodology used to select draft allocations in the Plan. The site selection methodology will continue to be used in the selection of sites in the final draft Local Plan (at Regulation 19 stage). The council will (and has now done so) also reflect on the comments made to the First Draft Local Plan and any changes in national planning policy. The council concluded with the following: Likely to increase traffic volume around the site and through the village. On street car parking is an issue The condition of the local road network is an issue. (Reiterated as per Paragraph 13.26 - Supporting Information Final Draft Plan).

So even by their own admission the council have acknowledged the offsite access issues, as detailed by The Highway Authority, that will need to be fully addressed with regard to the on street parking on Diglake street and intensification of use of the Diglake St/B5500 junction.

The offsite issues that need, as obviously pointed out by The Highways Authority, to be FULLY ADDRESSED are, I think that any right minded and competent person would wholeheartedly agree, TOTALLY UNACHIEVABLE in this instance.

Summary of Main Issues Raised (Health Issues)

It also appears that the proposed development (AB32) is no longer being proceeded with. Any particular reason? Access problems? Increase of NO2 near to houses on the access road? It would be nice to be informed of the reason(s) in this case.



**BASIS FOR OBJECTIONS.** The council by their own admission have since **acknowledged the offsite access issues**, as detailed by The Highway Authority, that will need to be fully addressed with regard to the on street parking on Diglake street and **intensification of use of the Diglake St/B5500 junction. (I have already pointed out this fact as one of the main objections to the development).**

### 03 MASTERPLANNING KEY PRINCIPLES

At Site AB12, a **11kV overhead powerline**, crosses the site from Raven's Lane to the north, and it is assumed that this will be diverted and/or undergrounded. There are also two sewers that run along the western edge of the site, adjacent to the site boundary separating the site from the rear of existing terraces. Based on United Utilities guidance, easements of a minimum 6m from the centre line of the sewers have been assumed to inform the masterplanning response.

### 3.4 Built Form

**BASIS FOR OBJECTIONS.** (Page 26 of the David Lock Report - **Appendix 2—Development Framework Plans** shows how the development would need to be carried out). \*\*\*\* The previous Draft Local Plan aimed to ensure that Sustainable Drainage Systems (SuDS) were integrated into new development. Staffordshire County Council was to undertake further technical work to model surface water run-off and identify potential attenuation requirements \*\*\*\* **On this plan there is a SuDs requirement exactly where it is suggested that residents' parking is to be placed to alleviate parking problems \*\*\*\***

## 04 MASTERPLANNING RESPONSE

At Site AB12, vehicular access is to be taken from Diglake Street. Provision is also to be made to create an emergency access from Raven's Lane, which will otherwise function to provide an additional footpath and cycle connection into the site (whilst retaining vehicular access to properties at 104 and 106 Raven's Lane). This connection will also allow convenient access to bus services on Raven's Lane and encourage trips to local community facilities within in walking distance in Bignall End and Audley.

#### 4.4 Green and Blue Infrastructure

**BASIS FOR OBJECTIONS.** Has this technical work been fully carried out fully?

## 05 SUMMARY AND CONCLUSIONS

As such, this report further supports the justified release of these sites from the Green Belt and that these sites should form part of the final adopted Local Plan.

### Attached Plans

### For Your Information

Mark G. Dennis

25 September 2024



<b>Attachments</b>	<a href="#">1338090 Mark Dennis 5 images.pdf</a>
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<b>Comment ID</b>	NULLP467
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Dixon
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I am writing to express my concerns about the policy for residential development at Marsh Parade, as outlined in Policy TC22. My primary concern is the lack of robust noise mitigation measures that could severely impact The Rigger, a well-established live music venue that contributes significantly to the cultural fabric of Newcastle-under-Lyme.</p> <p>While Policy TC22 includes a requirement for a noise and odour assessment (found on Page 155), it does not adequately address the specific risks posed to The Rigger, which is located in close proximity to the proposed development. As future residents move into these new dwellings, it is likely that they will file noise complaints against the venue. This could result in severe restrictions on The Rigger's ability to operate, leading to significant consequences for both the business and the local community that relies on it for live music and entertainment.</p> <p>Additionally, the policy does not appear to account for the "Agent of Change" principle as outlined in the National Planning Policy Framework (NPPF). This principle mandates that the developers, not existing businesses, are responsible for mitigating noise issues arising from new residential developments near existing venues. Without proper noise mitigation strategies and the inclusion of this principle in the proposal, The Rigger is at risk of facing unfair noise complaints, which could restrict or even force the venue to close.</p>

<b>Comment ID</b>	NULLP138
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Dowling
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP140
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Dowling
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in</p>

	<p>our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP923
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Dr D Hodgkinson
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10.</p> <p>Policy PSD5 proposes to alter Green Belt boundaries in order to allocate a number of development sites. It is considered that this policy is justified on the basis that there is limited urban capacity in Newcastle-under-Lyme, and there is a limited amount of previously developed land available to meet development needs. In particular, there is a high level of need for affordable housing and this cannot all be met within the urban boundary.</p> <p>Exceptional circumstances to justify the release of land from the Green Belt is set out further below. The policy concept of what constitutes exceptional circumstances for releasing land from the Green Belt through plan making has been considered in the High Court.</p> <p>In Compton Parish Council vs Guildford Borough Council [2019] EWHC 3242 (Admin) ("The Guildford judgement") where the main general issue of the challenge was whether the Inspector, in recommending that the Local Plan be adopted, had erred in law in his approach to what constituted the "exceptional circumstances" required for the redrawing of Green Belt boundaries in a local plan review.</p> <p>In the Guildford judgment, Sir Duncan Ousley, sitting as a High Court Judge confirmed that:</p> <p>(a) There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.</p> <p>(b) Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.</p> <p>(c) A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.</p> <p>(d) "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."</p> <p>(e) The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.</p> <p>(f) General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.</p> <p>The above judgement confirms that there is a very broad exercise of planning judgment for the decision-maker which the courts will not readily disturb. This can include meeting the need for market housing.</p> <p>The NPPF (paragraph 141) provides more guidance on what will add up to exceptional circumstances: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</p> <p>a) makes as much use as possible of suitable brownfield sites and underutilised land;</p> <p>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</p> <p>c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.</p> <p>In the case of Newcastle-under-Lyme, each of the above will be taken in turn.</p> <p>Making as much use as possible of Suitable Brownfield Sites and Underutilised Land</p> <p>The Council recently undertook a call for brownfield sites exercise and a Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (June 2023) forms part of the evidence</p>



base. This study considered a range of vacant and infill sites, and considered the scope for the conversion of upper storey floorspace of existing commercial buildings. This study was also informed by sites identified in the SHELAA.

Paragraph 8.11 of the Issues and Options consultation document previously consulted upon stated that evidence gathered as part of the now abandoned Joint Local Plan exercise with Stoke-on-Trent City Council suggested that approximately 2,500 dwellings could be found on land within existing development boundaries, which would be at least 4,660 dwellings short of the minimum housing requirement figure established using the nationally set starting requirement of 7,160 established using the Standard Method or 5,500 short of the Regulation 19 Local Plan requirement of 8,000 dwellings.

The latest SHELAA and Urban Capacity Study have not identified any significant amounts of further brownfield sites that were not considered previously. The latest SHELAA (dated 2024) identifies a deliverable and developable supply of brownfield sites that amount to the delivery of 1,938 homes. When other deliverable and developable greenfield site that are not located in the Green Belt are considered, there is a capacity to deliver a further 1,012 dwellings. Mixed brownfield/greenfield sites can deliver a further 147 dwellings. This amounts to a total of 3,097 dwellings that are deliverable/already have planning permission or developable. This amounts to a shortfall of at least 4,093 dwellings.

The above figures strongly suggest that land beyond existing settlement boundaries is required to deliver the Council's minimum housing requirement of 8,000 dwellings over the plan period.

Whilst national policy seeks to exhaust previously developed sites for housing delivery before releasing Green Belt sites, meeting housing needs also have to be balanced with meeting economic development needs, with many economic development needs (including, but not limited to, office, retail, leisure, manufacturing and distribution) also requiring the use of previously developed land or buildings. This is particularly true if they are located on existing employment parks or within town centres, or otherwise located where businesses require to be located based on their business needs and/or customer demands. In light of these conclusions, it is considered that the Council has made good progress in granting planning permission for residential development on sites within the development boundary, including on brownfield land, however it is very clear that minimum housing needs cannot be met on these types of sites alone.

#### Optimising the Density of Development

With regard to optimising the density of development, if limited development sites are available within existing development boundaries, then opportunities for delivering higher density development will be limited. Whilst some higher density development has occurred within Newcastle-under-Lyme town centre, other opportunities are likely to be limited due to the following factors:

- (a) Conservation areas / special character area designations
- (b) Listed buildings and the need to appropriately take into account their settings
- (c) Prevailing densities/character of existing residential areas, particular those of sub-urban character where high density or high rise development is likely to be inappropriate in design and amenity terms
- (d) Other locational specific constraints.

Whilst there may be possibilities to increase the density of new development within existing urban areas or other non-Green Belt sites, it is unlikely that this could be done on a sufficient number of such sites to remove any need to release land from the Green Belt at all.

#### Meeting any Unmet Housing Needs in Neighbouring Authorities

At the time of preparing this Local Plan, a number of neighbouring authorities have recently adopted development plans. Staffordshire Moorlands adopted a local plan in 2020 and Cheshire East Council adopted its part 1 Local Plan Strategy in 2017. The Cheshire East Site Allocations and Policies DPD has also been recently adopted. Stafford Borough Council are currently reviewing their local plan, but have yet to reach examination stage. Stoke-on-Trent City Council are also in the early stages of preparing a new Local Plan.

In light of the above, the following authorities are unlikely to be in a position to accommodate any unmet needs in Newcastle-under-Lyme:

- (a) Cheshire East
- (b) Shropshire
- (c) Staffordshire Moorlands

With regard to Stafford Borough and Stoke-on-Trent, it is, at this stage, unclear what additional needs these authorities may be able to accommodate, however it should be noted that Stoke-on-Trent's minimum housing needs are currently subject to the 35% uplift for urban areas, so it is unclear if any further need from Newcastle-under-Lyme could be met within Stoke-on-Trent over the plan period. Furthermore, the Governments review of the Standard Method suggests that local housing need figures for all surrounding local authority areas could significantly increase over and above the existing Standard Method requirement if the new Standard Method is confirmed.

With regard to Stoke-on-Trent, when Newcastle-under-Lyme were pursuing a Joint Local Plan with Stoke-on-Trent City Council, Stoke-on-Trent indicated that they could accommodate around 800 dwellings of Newcastle-under-Lyme's unmet needs. This figure still remains substantially short of the housing need required in Newcastle-under-Lyme that cannot be accommodated within existing development boundaries. Stoke-on-Trent have yet to make significant progress on a new Local Plan since a consultation on Issues and Options took place between May and June 2021.

With regard to economic development needs, this will also be a material factor, particularly where economic growth factors are linked to existing employment sites that need to expand and are inextricably linked, such as Keele University and Science Park. Their expansion needs are unlikely be able to be accommodated in other local authority areas and will need to be anchored to their existing site. As such, in addition to housing factors, there are economic development needs that won't be able to be accommodated in other local authority areas.

#### Other Considerations Amounting to Exceptional Circumstances to Justify the Release of Land from the Green Belt

As set out above, meeting housing needs can amount to exceptional circumstances to justify the release of land from the Green Belt. By extension, this is also considered to apply in terms of meeting economic development needs and facilitating sustainable patterns of development in the Borough.

Having a suitable range of employment sites in suitable locations to meet future economic development needs and providing more scope to adapt to future changes in the economy therefore justify the need

	<p>to review Green Belt boundaries. For example, Newcastle-under-Lyme is well located in relation to the strategic road network, in particular the A500 and the M6. Large warehouses and distribution centres will require large sites with good access to the strategic road network, and such sites are best placed to be located outside of urban areas where access for large vehicles is likely to be more problematic. As such, it is considered that a review of the Green Belt in Newcastle-under-Lyme is necessary to meet both economic needs and housing needs.</p> <p>Promoting sustainable patterns of development is also a relevant factor to consider, as set out at paragraph 142 of the Framework, which states:</p> <p>When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.</p> <p>The above was a material factor explored at length during the examination of the Cheshire East Local Plan, with northern parts of the Borough heavily constrained by Green Belt designations.</p> <p>Green Belt release around the northern towns in the Cheshire East Borough was justified as follows<sup>1</sup>: Without alterations to the detailed Green Belt boundaries, the amount of new development that could be planned for in the north of the borough would be very low. It is considered that such a low level of development would have severe consequences including:</p> <ul style="list-style-type: none"> <li>• Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to young people and key workers being unable to stay in the area.</li> <li>• An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age.</li> <li>• Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.</li> <li>• Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area</li> </ul> <p>decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.</p> <p>Some parallels can be drawn between Cheshire East and Newcastle-under-Lyme. For example, as Newcastle-under-Lyme town is currently ring-fenced by Green Belt, any substantial levels of development on non-Green Belt land outside of the development boundary would need to leapfrog the Green Belt towards the periphery of the Borough in locations such as Loggerheads, although it is acknowledged that the settlements of Baldwins Gate and Loggerheads, which are not heavily constrained by Green Belt, are considered to be sustainable locations.</p> <p>More broadly, the release of sites from the Green Belt on the periphery of the urban area in particular, sites around/adjacent to higher order settlements such as Kidsgrove/Talke, for example, through the allocation of TK10, would deliver a sustainable pattern of development that is aligned to the Council's economic growth aspirations.</p> <p>In addition, there is a substantial need to deliver an uplift in affordable housing in Newcastle-under-Lyme in light of the high level of affordable housing need, with a need to deliver a net increase of at least 278 affordable homes per annum.</p> <p>The above considerations add further weight to the case that exceptional circumstances exist to justify Green Belt release in Newcastle-under-Lyme Borough.</p> <p>In light of the above, it is considered that Policy PSD5 is justified, as are the proposed allocations that follow from it. Dr Hodgkinson therefore supports Policy PSD5 and the release of TK10 for the delivery of around 170 dwellings.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Attachments</b>	<a href="#">1342419 Dr Hodgkinson - Crown Bank - TK10 7.10.2024.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 2 SHELAA Information.pdf</a>
<b>Comment ID</b>	NULLP921
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Dr D Hodgkinson
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes

<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10.</p> <p>This policy seeks to direct most development towards the urban areas of Newcastle-under-Lyme and Kidsgrove with some more limited development to the rural centres.</p> <p>In general terms, there is no objection to the policy presumption to directing the most development towards the larger urban centres, Keele University and the edge of large developed areas such as Talke. Growth around Kidsgrove Urban Centre (including Talke)</p> <p>Talke is located on the edge of the Kidsgrove Urban Centre and is a highly sustainable location with convenient access to the strategic road network, including the A34 and the A500.</p> <p>Draft allocation TK10 is well placed to accommodate sustainable growth in an appropriate location and at a scale commensurate to the adjoining settlement.</p> <p>TK10 can deliver high quality housing in close proximity to employment as well as providing housing in close proximity to other services and facilities within the urban area.</p> <p>Therefore, this growth is supported as part of the overall distribution of development. TK10 is an important component of this distribution of development and the allocation of this site should be maintained and is considered to be sound.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Attachments</b>	<a href="#">1342419 Dr Hodgkinson Appendix 2 SHELAA Information.pdf</a> <a href="#">1342419 Dr Hodgkinson - Crown Bank - TK10 7.10.2024.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP925
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Family Name</b>	Dr D Hodgkinson
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10. With regard to allocations, Dr Hodgkinson supports the inclusion of allocation reference TK10 for 170 dwellings.</p> <p>This site, which covers an area in excess of 5ha, is located in Green Belt, but directly adjacent to its boundary with the urban area in Talke.</p> <p>The site is located at the very edge of the Green Belt. It is adjoined by residential development immediately to the east, which is outside the Green Belt/in the urban area. An industrial estate adjoins the site to the south, which again is located outside the Green Belt.</p> <p>This is a sustainable and accessible site, with excellent access to bus services which in turn provide good access to the centres of Hanley, Newcastle-under-Lyme and elsewhere. The site lends itself to an extension to the built-up area of Talke, providing an opportunity to deliver a reasonable number of family and affordable key worker homes to support the sustainability and development of the area.</p> <p>This site is a logical location to accommodate growth in this part of Newcastle-under-Lyme to align with this strategy. It is considered that development on this site would not contradict any of the five purposes of including land within the Green Belt and would provide a logical location to provide housing on the edge of the Urban Area.</p> <p>In visual terms, the site sits within a bowl, and within the site, the surrounding views comprise housing to the north and east, Talke Retail Park and the industrial park to the south and west. The large buildings located on Talke Retail Park and the industrial park dominate the views towards the south and west giving the site a contained feel, rather than a feel of tranquil open countryside in this location. There are therefore visual defensible boundaries to the site, and in visual terms, the visual impact of releasing the site from the Green Belt would be limited.</p> <p>With regard to the first sentence of the policy, it states that the site "is allocated for residential development for 170 dwellings". In order to allow a degree of flexibility, it is suggested that the wording is amended slightly to read as follows: "is allocated for residential development for in the region of 170 dwellings".</p> <p>With regard to the allocation criteria of Policy TK10, each of the relevant criteria will be considered below in turn.</p> <p>Criteria 1 states that the requirements of Policy SA1 should be satisfactorily addressed. Policy SA1 sets out a number of requirements for the proposed site allocations that need to be addressed, including the following:</p>

	<p>(a) Masterplans  (b) Affordable housing  (c) Housing mix and density  (d) Design  (e) Historic environment  (f) Social and community facilities  (g) Landscape and green infrastructure  (h) Biodiversity and Geodiversity  (i) Highways  (j) Environmental Health  (k) Flood Risk  (l) Utilities  (m) Infrastructure  (n) Minerals</p> <p>In addition to the above, additional criteria 2 – 12 require other areas to be addressed through any planning application submission.</p> <p>In response to the above criteria, a copy of a submission to the Council's Strategic Housing and Employment Land Availability Assessment is provided at Appendix 2 to demonstrate how various matters will be addressed and otherwise helps to demonstrate the suitability of the site for allocation.</p> <p>In light of the above considerations, Dr Hodgkinson supports the allocation of TK10. Dr Hodgkinson is currently in discussions with housing developers to bring this site forward, should the allocation be confirmed and adopted in the Local Plan with at least three developers expressing serious interest in the site.</p> <p>Dr Hogkinson will continue to engage with developers in due course following the close of this consultation in order to bring forward a development partner for the site to ensure that the site would be deliverable within the proposed plan period.</p> <p><b>DELIVERABILITY</b></p> <p>Allocation reference TK10, whilst being promoted by a private landowner, is deliverable. Dr Hodgkinson is a willing landowner and is prepared to make the land available for development. Dr Hodgkinson is already in discussions with developers to sell the site for development.</p> <p>In terms of delivery, it is anticipated that housing would be delivered at a rate of around 30-50 homes per annum.</p> <p>It is anticipated that upon the approval of an outline planning application, a reserved matters application would follow within 3-6 months of obtaining outline planning permission.</p> <p>It is estimated that the first site works would take place on the site within a year of obtaining outline planning permission.</p> <p>The site would therefore be deliverable within the plan period and would start delivering homes within the first five years following adoption of the Local Plan.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Attachments</b>	<a href="#">1342419 Dr Hodgkinson Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 2 SHELAA Information.pdf</a> <a href="#">1342419 Dr Hodgkinson - Crown Bank - TK10 7.10.2024.pdf</a>
<b>Comment ID</b>	NULLP922
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Dr D Hodgkinson
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10.</p> <p>As is acknowledged elsewhere in this submission, there is a substantial need for a step-change in open market and affordable housing delivery across the Borough, including in the rural areas. It should be ensured that the settlement boundaries are redrawn on the new policies maps that encompass existing</p>

	development sites that have come forward on countryside sites in recent years, as well as encompassing proposed allocations. In the case of Kidsgrove/Talke, the settlement boundary should be re-drawn around site allocation reference TK10.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Attachments</b>	<a href="#">1342419 Dr Hodgkinson Appendix 2 SHELAA Information.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1342419 Dr Hodgkinson - Crown Bank - TK10 7.10.2024.pdf</a>
<b>Comment ID</b>	NULLP920
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Dr D Hodgkinson
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10</p> <p>The Council's overall development strategy seeks to deliver a minimum of 8,000 dwellings over the plan period at 400 dwellings per annum. At Regulation 18 stage, the Council sought to deliver 7,160 dwellings over the plan period (358 dwellings per annum).</p> <p>At Regulation 18 stage, we argued on behalf of Dr Hodgkinson that the housing requirement should be higher on the basis that the affordable housing need identified at that time (278 affordable homes per annum) amounted to around 77% of the housing requirement.</p> <p>As such, the increase of the requirement to 400 dwellings per annum is welcome and is supported, however the annual affordable housing need still equates to around 69% of the annual housing requirement for Newcastle-under-Lyme.</p> <p>The expression of the housing requirement as a minimum starting point is welcome.</p> <p>Given the high level of affordable housing need and the Council's aspirations to deliver economic growth, it is considered that the increase in the annual housing requirement is justified by the evidence and is therefore sound.</p> <p>It is therefore suggested that, as a minimum, all the proposed allocations identified in the current DLP must be retained in order to ensure that the housing requirement can be delivered over the plan period.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Dr D Hodgkinson for allocation reference TK10
<b>Attachments</b>	<a href="#">1342419 Dr Hodgkinson - Crown Bank - TK10 7.10.2024.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a> <a href="#">1342419 Dr Hodgkinson Appendix 2 SHELAA Information.pdf</a>

<b>Comment ID</b>	NULLP1258
<b>Order</b>	48
<b>Title</b>	Policy HOU4: Gypsy, Travellers and Travelling Showpeople
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU4
<b>Q6 Details</b>	<p>1. E Policy HOU 4:</p> <p>a. From the map produced it is difficult to see where the site locations are (the key and symbols are and too small to be usable and readable.</p> <p>b. RE Gypsy/Traveler Accommodation: This is a step in the right direction that land has finally been allocated for a site and that 5 extra pitches are suggested for the plan period. That said:</p> <p>c. It is concerning that the plan provision will not take effect until 2026 or later when the landfill ceases to collect waste. The families have lived (some of them next to this site since 1994). When the landfill site closes reconstitution will begin. This will involve the large-scale import of soil and other dust bearing materials, which could continue for possibly another 20 years (2046) and which will need suitable mitigation measures. Particulates smaller than 2.5 particulates have no acceptably safe limits re exposure. Limits, however, are imposed on levels of H2S exposure. (Perhaps this should have been considered in Local Plans when the landfill site was permitted in 1947 and subsequently when housing was being permitted ever closer to the site in 2004 which is ongoing.)</p> <p>d. The site that appears to be chosen is on land currently used to store waste white goods including fridges and other sundry contaminating materials. This would suggest that the land would be contaminated. The site would also be too close to the working surface of the landfill site as a permanent residence - ie across the road and within 80 metres. The original safe off-set limit for the housing site advocated by the EA was 250 meters. This was appealed and reduced to 100 m by Persimmon Homes in (2004) and more recently the off-set limit has been reduced to around 80m. The current Traveller site is within 49 m of the site. Given the issues that have arisen and that will arise after the site is closed to waste infilling, it will be imperative that the off-set limit of 250m be reinstated for any new development order to avoid serious issues over the next 20 years. This should be part of this plan.</p> <p>e. The former 9 hole golf course suggested by the TRA as a suitable site appears to have been ignored. It would be further away from this peri urban/semi -industrial fringe area of the borough, marked by Cemetery Road and the landfill site, which would be much more conducive to permanent and more sustainable residential use.</p> <p>f. The allocation over the plan period is for 5 pitches. At the moment there are around 16 families on the existing site. It is unclear if the 16 families are to be relocated to the new site and that the five pitches mentioned are to be graduated additions. There would seem to be little or no leeway for internal family growth or for transit families. Whilst guidance suggests that it is preferable for transit and resident families not share a site, this suggests that there might be no provision for transit families, which real data suggests is needed. This plan therefore would not provide the necessary accommodation for transit families.</p> <p>g. It was suggested that the currently used site be maintained as a short-term transit site for mobile families on a short-term-agreed basis. Issues of health and safety notwithstanding.</p> <p>h. It was also suggested that the accommodation, if any is to be offered on site, and given that this is a site for permanent occupation, that it be more aspirational and in keeping with the aspirations of the Gypsy families who might aspire to more than a caravan. This could include more permanent structures if needed. The current legal, definitions which tie families to caravans or a way of life enforcing mobility rather than permanence within a chosen way of life might be construed as discriminatory. Given that other special needs groups are being given consideration in this Plan, then this plan policy would be limiting for Gypsy/Traveller families and, therefore, unsound because it would not be meeting the real as opposed to the assumed needs of this particular community.</p>
<b>Comment ID</b>	NULLP1262
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3



## Q6 Details

2. RE Housing provision contained in Policies PSD1 – PSD 7 and with regard to housing allocations per borough/ward areas:

a. The total allocations for the Borough has been increased from 5,000 units to 8,000. Under the changes to the NPPF rules, does this mean that national government has intervened to change the level of development that the NBC adopted based on the last consultation which took place for the last draft of the Plan?

b. If the supporting documents are read and understood, these estimates are based on guestimates and over- estimates for some localities, which might include Newcastle Borough. The reliance for the estimates appears to be on the 2011 and 2021 (even the 2001 census is mentioned) census material. Some data had been updated to 2023 but seemed questionable. The post- Covid total population needs to be verified to be made part of any assessment in the interests of accuracy and unnecessary development.

c. The issue of empty homes has not been mentioned, even though the number in this and other LAs would appear to be high. Pre- Covid, when enquiries were made of the NBC by the TRA, 1100 was a figure mentioned. Councils have all the necessary powers to bring such homes back into commission and resources should be allocated at both national and local levels to do this. This level of empty homes should not be regarded as acceptable or sustainable if there are shortages.

d. Whilst the Plan makes some attempt to deal with the issue of affordable homes and social housing, whilst the term home (as a need) and house (as a commodity) are confused and left to the mercy of market forces to decide affordability, the issue will not be resolved, and need will not be satisfactorily met.

e. Neither does the Plan factor in that the purchase of a house/home might be the easier part. The more difficult part is maintaining property so that it remains habitable and affordable.

f. Does the LA know how many homes have been repossessed? Or how many residents have abandoned private ownership in favour of public or private rental as a more affordable option?

g. In Newcastle-under-Lyme student flats and bedsits have been favoured over other types of housing. This Plan suggests it might perpetuate those kinds of development when other types are needed. Some student developments have already 'extended' their criteria to other users, since take up has not been as high as expected.

h. Providing affordable homes, therefore, is not a stand-alone issue although it would appear that cross-cutting issues have been ignored, or not considered. Additional updated data and analysis are needed to ensure sound decision-making and effective solutions that transcend any political influences, allowing for more objective and sustainable outcomes necessary.

8. The Future of the Plan System

Although this is not contained within the remit of the Plan it might be the time to introduce such concepts in order to deal with the issues that prevent plans from a) being drawn up in a timely manner and b) from being implemented with good will, and in a timely manner.

a. After reading the Plan it seems to be not necessarily a ground-up Plan in forward planning, but an attempt to fulfil all the legal, national, government requirements which have been imposed, using the tick-box vocabulary.

b. It would appear that within LAs that there are short-term enthusiasms for projects which wears off as new projects are streamed. Enthusiasm seems to equate with levels of resources invested. This also means that some projects are not actually needed or required and add little value.

c. The new NPPF rules reveal the tensions between national government and local authorities, particularly in the areas of control of development and resources.

d. Local Authorities seem to have evolved their own ways of doing things which means that either practices and procedures need to be standardised, or that one size does not fit all and that each local council needs to formulate its own plan with reference to its unique needs without the interference of national government – with national government being the final scrutineer/arbitrator. However, this might need a new and different kind of Councillor and MP.

e. It would seem that, currently, national and local government might not be on the same wavelength. It seems that in some cases, national government is a driving force for implementation of its own wish lists, and that Local Government is a line of resistance with ideas of its own. A more collaborative and meaningful dialogue might produce a more meaningful dialogue and mutual compromises in order to bring about a better working relationship.

f. Given how dynamic and fast-moving situations can be at the local level it is questionable whether or not setting a plan to cover 20 years is possible or even feasible so that it is fit for purpose.

g. Some of the proposals in the Plan have already happened so the Plan appears to be retrospective – rather than forward looking. The same could be said of the housing allocations and provision – some have already been built so there is a confusion between what has been, what is, what is needed and what might/should be. Whilst the five year 'banks' for land and quantities of units might go some way to prevent evasion, it is important that the methodology is also fully understood and implemented into a workable rolling system.

h. The system of local governance was outdated even in 1972 when it was introduced. However, the system still clings to 19th Century principles and rules. Some parish councils are particularly out of date even with those rules. Many parish councils do not have the policies to ensure they are acting legally or even democratically – a term which is losing its meaning. Increasingly it seems that governance has become so eroded, in some contexts it might no longer exist.

i. Rules and overarching policies are often vague (if they exist) and are differentially interpreted within and between councils. Councillors appear to lack the necessary support to place things back on track. Chairs and Clerks can be equally and increasingly ill-equipped to deal with the kind of governance required in a 21 Century which appears to be controlled by the internet, social media and hearsay. Truth is rapidly losing its appeal.

	j. To inform the latest Plan perhaps there is a need to quantify the real successes (and failures) of its predecessor in order to avoid making the same mistakes in the next 20 year Plan period.
<b>Comment ID</b>	NULLP1266
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>5. The Issues of the Green Belt and the Countryside development - Sustainable Environment Policies and the issue of the 5 year supply of land for housing and employment and town centre uplift:</p> <p>a. In order to comply with NPPF rules and guidance, there are some LAs which might over-develop in order to avoid national government interference. This could lead not only to saturation but also to unnecessary encroachment into the green belt and/or countryside. The issue of the land (especially farmland) alienated by the HS2 project has not been dealt with or clarified given that so much land has been appropriated and taken out of commission from farms (the countryside (and the green belt)?) and may not be used again as farming land. If this is the case this will have been a back door enclosure of the countryside, cutting a swathe down the centre of England, and providing developers with land they have always wanted.</p> <p>b. The (Stones) Market is regularly 'improved' (revamped/reduced) but solutions have not led to its development or improvement, success and well being, only its decline. Given that the identity of Newcastle-under-Lyme is that of 'Market Town' this is becoming harder to justify. Developers would be aware of the difference between the statements and claims about Newcastle-under-Lyme (appearance) and its reality.</p> <p>c. It is only recently that the NBC has viewed itself as a University Town – which it has been for the past 75 years – an opportunity missed or possibly not even recognised?</p>
<b>Comment ID</b>	NULLP1268
<b>Order</b>	100
<b>Number</b>	11
<b>Title</b>	Sustainable Environment
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>5. The Issues of the Green Belt and the Countryside development - Sustainable Environment Policies and the issue of the 5 year supply of land for housing and employment and town centre uplift:</p> <p>a. In order to comply with NPPF rules and guidance, there are some LAs which might over-develop in order to avoid national government interference. This could lead not only to saturation but also to unnecessary encroachment into the green belt and/or countryside. The issue of the land (especially farmland) alienated by the HS2 project has not been dealt with or clarified given that so much land has been appropriated and taken out of commission from farms (the countryside (and the green belt)?) and may not be used again as farming land. If this is the case this will have been a back door enclosure of the countryside, cutting a swathe down the centre of England, and providing developers with land they have always wanted.</p> <p>b. The (Stones) Market is regularly 'improved' (revamped/reduced) but solutions have not led to its development or improvement, success and well being, only its decline. Given that the identity of Newcastle-under-Lyme is that of 'Market Town' this is becoming harder to justify. Developers would be aware of the difference between the statements and claims about Newcastle-under-Lyme (appearance) and its reality.</p> <p>c. It is only recently that the NBC has viewed itself as a University Town – which it has been for the past 75 years – an opportunity missed or possibly not even recognised?</p>
<b>Comment ID</b>	NULLP1261
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association

<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>2. RE Housing provision contained in Policies PSD1 – PSD 7 and with regard to housing allocations per borough/ward areas:</p> <p>a. The total allocations for the Borough has been increased from 5,000 units to 8,000. Under the changes to the NPPF rules, does this mean that national government has intervened to change the level of development that the NBC adopted based on the last consultation which took place for the last draft of the Plan?</p> <p>b. If the supporting documents are read and understood, these estimates are based on guestimates and over- estimates for some localities, which might include Newcastle Borough. The reliance for the estimates appears to be on the 2011 and 2021 (even the 2001 census is mentioned) census material. Some data had been updated to 2023 but seemed questionable. The post- Covid total population needs to be verified to be made part of any assessment in the interests of accuracy and unnecessary development.</p> <p>c. The issue of empty homes has not been mentioned, even though the number in this and other LAs would appear to be high. Pre- Covid, when enquiries were made of the NBC by the TRA, 1100 was a figure mentioned. Councils have all the necessary powers to bring such homes back into commission and resources should be allocated at both national and local levels to do this. This level of empty homes should not be regarded as acceptable or sustainable if there are shortages.</p> <p>d. Whilst the Plan makes some attempt to deal with the issue of affordable homes and social housing, whilst the term home (as a need) and house (as a commodity) are confused and left to the mercy of market forces to decide affordability, the issue will not be resolved, and need will not be satisfactorily met.</p> <p>e. Neither does the Plan factor in that the purchase of a house/home might be the easier part. The more difficult part is maintaining property so that it remains habitable and affordable.</p> <p>f. Does the LA know how many homes have been reposessed? Or how many residents have abandoned private ownership in favour of public or private rental as a more affordable option?</p> <p>g. In Newcastle-under-Lyme student flats and bedsits have been favoured over other types of housing. This Plan suggests it might perpetuate those kinds of development when other types are needed. Some student developments have already 'extended' their criteria to other users, since take up has not been as high as expected.</p> <p>h. Providing affordable homes, therefore, is not a stand-alone issue although it would appear that cross-cutting issues have been ignored, or not considered. Additional updated data and analysis are needed to ensure sound decision-making and effective solutions that transcend any political influences, allowing for more objective and sustainable outcomes necessary.</p> <p>8. The Future of the Plan System</p> <p>Although this is not contained within the remit of the Plan it might be the time to introduce such concepts in order to deal with the issues that prevent plans from a) being drawn up in a timely manner and b) from being implemented with good will, and in a timely manner.</p> <p>a. After reading the Plan it seems to be not necessarily a ground-up Plan in forward planning, but an attempt to fulfil all the legal, national, government requirements which have been imposed, using the tick-box vocabulary.</p> <p>b. It would appear that within LAs that there are short-term enthusiasms for projects which wears off as new projects are streamed. Enthusiasm seems to equate with levels of resources invested. This also means that some projects are not actually needed or required and add little value.</p> <p>c. The new NPPF rules reveal the tensions between national government and local authorities, particularly in the areas of control of development and resources.</p> <p>d. Local Authorities seem to have evolved their own ways of doing things which means that either practices and procedures need to be standardised, or that one size does not fit all and that each local council needs to formulate its own plan with reference to its unique needs without the interference of national government – with national government being the final scrutineer/arbitrator. However, this might need a new and different kind of Councillor and MP.</p> <p>e. It would seem that, currently, national and local government might not be on the same wavelength. It seems that in some cases, national government is a driving force for implementation of its own wish lists, and that Local Government is a line of resistance with ideas of its own. A more collaborative and meaningful dialogue might produce a more meaningful dialogue and mutual compromises in order to bring about a better working relationship.</p> <p>f. Given how dynamic and fast-moving situations can be at the local level it is questionable whether or not setting a plan to cover 20 years is possible or even feasible so that it is fit for purpose.</p> <p>g. Some of the proposals in the Plan have already happened so the Plan appears to be retrospective – rather than forward looking. The same could be said of the housing allocations and provision – some have already been built so there is a confusion between what has been, what is, what is needed and what might/should be. Whilst the five year 'banks' for land and quantities of units might go some way to prevent evasion, it is important that the methodology is also fully understood and implemented into a workable rolling system.</p> <p>h. The system of local governance was outdated even in 1972 when it was introduced. However, the system still clings to 19th Century principles and rules. Some parish councils are particularly out of date</p>

	<p>even with those rules. Many parish councils do not have the policies to ensure they are acting legally or even democratically – a term which is losing its meaning. Increasingly it seems that governance has become so eroded, in some contexts it might no longer exist.</p> <p>i. Rules and overarching policies are often vague (if they exist) and are differentially interpreted within and between councils. Councillors appear to lack the necessary support to place things back on track. Chairs and Clerks can be equally and increasingly ill-equipped to deal with the kind of governance required in a 21 Century which appears to be controlled by the internet, social media and hearsay. Truth is rapidly losing its appeal.</p> <p>j. To inform the latest Plan perhaps there is a need to quantify the real successes (and failures) of its predecessor in order to avoid making the same mistakes in the next 20 year Plan period.</p>
<b>Comment ID</b>	NULLP1265
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET1
<b>Q6 Details</b>	<p>PCD3 and 9 RET1, 4 Retail and service Issues:</p> <p>a. There are new large-scale developments proposed in this Plan (some suggested before 2019). It is difficult to know if these have now been secured or if they are still part of a wish list. Currently there are retail units which have never been wholly occupied (or have seen constant short-term turnover) in and around the town centre (York Place (1964), Lymelight Arcade (2014), the Roebuck Centre (1986) and the arcade linking Merrial Street with the Ironmarket (in 2000s?). Have the reasons for this phenomenon been factored into future developments, or the estimated suggested allocations, so that unnecessary demolition and destruction do not become part of the Plan? Formalising such practices as sustainable and acceptable processes are not necessarily the best use of resources, scarce or otherwise.</p> <p>b. Have the reasons for the demise of the town been sufficiently analysed and taken into account in order to avoid making the same mistakes?</p> <p>c. The former retail units mentioned above are now destined for demolition/partial demolition, with replacements advocated in the Plan. This should not be regarded as an acceptable or sustainable strategy and for the sake of complying with national government's overestimated allocations, and certainly not without factoring in up-to-date information. This is important in LAs where developable land is scarce, and where alternative uses might be preferable.</p> <p>d. The issue of car parking in and around Newcastle-under-Lyme town centre, which has not been satisfactorily resolved, has had an impact on retailing in an already declining and reduced retail offer. Developing the smaller car parks around the town might not be a good idea in the long term. The issue of carparking might have been reassessed to inform the plan in order to come to a better solution to encourage a larger footfall to the town centre.</p> <p>e. Online shopping and the changed behaviour of customers, evident before Covid, and more pronounced afterwards, has reduced the patronage of high street shops. The cross-cutting issues compounding the decline of the high Street need to be satisfactorily explored and resolved if the Plan is to be effective over the next 20 years.</p>
<b>Comment ID</b>	NULLP1269
<b>Order</b>	69
<b>Title</b>	Policy EMP2: Existing Employment Sites
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EM2
<b>Q6 Details</b>	<p>6 Re Employment EMP 1-2</p> <p>a. The emphasis for employment appears to be based on location (just off the M6).</p> <p>b. Future developments seem to focus on logistics and warehousing. Although the plan claims that there is a need to encourage high end professional and technical personnel there would seem to be a distinct socio-economic divide between these two types of employment, particularly in the political discourse which would keep north Staffordshire low waged and low-skilled.</p> <p>c. There would appear to be a distinct culture and mindset in north Staffordshire which needs to be addressed if the two are to be reconciled both socially and economically. Provision of opportunities to</p>

	<p>obtain and improve qualifications and skills exist but concerns are being expressed that these are not being taken up to full advantage and capacity.</p> <p>d. The NBC in this Plan seems to accept a low wage, low-skilled ethos, which might be an investment attraction for some employers. However, this low aspiration serves to depress the area, rather than provide uplift. If the Plan is to produce a higher aspirational yardstick, then encouraging more of the same and taking the line of least resistance, will not do. The prevailing mind set and culture also need to change.</p>
<b>Comment ID</b>	NULLP1273
<b>Order</b>	20
<b>Number</b>	5
<b>Title</b>	Planning for Sustainable Development
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>2. RE Housing provision contained in Policies PSD1 – PSD 7 and with regard to housing allocations per borough/ward areas:</p> <p>a. The total allocations for the Borough has been increased from 5,000 units to 8,000. Under the changes to the NPPF rules, does this mean that national government has intervened to change the level of development that the NBC adopted based on the last consultation which took place for the last draft of the Plan?</p> <p>b. If the supporting documents are read and understood, these estimates are based on guestimates and over- estimates for some localities, which might include Newcastle Borough. The reliance for the estimates appears to be on the 2011 and 2021 (even the 2001 census is mentioned) census material. Some data had been updated to 2023 but seemed questionable. The post- Covid total population needs to be verified to be made part of any assessment in the interests of accuracy and unnecessary development.</p> <p>c. The issue of empty homes has not been mentioned, even though the number in this and other LAs would appear to be high. Pre- Covid, when enquiries were made of the NBC by the TRA, 1100 was a figure mentioned. Councils have all the necessary powers to bring such homes back into commission and resources should be allocated at both national and local levels to do this. This level of empty homes should not be regarded as acceptable or sustainable if there are shortages.</p> <p>d. Whilst the Plan makes some attempt to deal with the issue of affordable homes and social housing, whilst the term home (as a need) and house (as a commodity) are confused and left to the mercy of market forces to decide affordability, the issue will not be resolved, and need will not be satisfactorily met.</p> <p>e. Neither does the Plan factor in that the purchase of a house/home might be the easier part. The more difficult part is maintaining property so that it remains habitable and affordable.</p> <p>f. Does the LA know how many homes have been repossessed? Or how many residents have abandoned private ownership in favour of public or private rental as a more affordable option?</p> <p>g. In Newcastle-under-Lyme student flats and bedsits have been favoured over other types of housing. This Plan suggests it might perpetuate those kinds of development when other types are needed. Some student developments have already 'extended' their criteria to other users, since take up has not been as high as expected.</p> <p>h. Providing affordable homes, therefore, is not a stand-alone issue although it would appear that cross-cutting issues have been ignored, or not considered. Additional updated data and analysis are needed to ensure sound decision-making and effective solutions that transcend any political influences, allowing for more objective and sustainable outcomes necessary.</p> <p>8. The Future of the Plan System</p> <p>Although this is not contained within the remit of the Plan it might be the time to introduce such concepts in order to deal with the issues that prevent plans from a) being drawn up in a timely manner and b) from being implemented with good will, and in a timely manner.</p> <p>a. After reading the Plan it seems to be not necessarily a ground-up Plan in forward planning, but an attempt to fulfil all the legal, national, government requirements which have been imposed, using the tick-box vocabulary.</p> <p>b. It would appear that within LAs that there are short-term enthusiasms for projects which wears off as new projects are streamed. Enthusiasm seems to equate with levels of resources invested. This also means that some projects are not actually needed or required and add little value.</p> <p>c. The new NPPF rules reveal the tensions between national government and local authorities, particularly in the areas of control of development and resources.</p> <p>d. Local Authorities seem to have evolved their own ways of doing things which means that either practices and procedures need to be standardised, or that one size does not fit all and that each local council needs to formulate its own plan with reference to its unique needs without the interference of national government – with national government being the final scrutineer/arbitrator. However, this might need a new and different kind of Councillor and MP.</p>



	<p>e. It would seem that, currently, national and local government might not be on the same wavelength. It seems that in some cases, national government is a driving force for implementation of its own wish lists, and that Local Government is a line of resistance with ideas of its own. A more collaborative and meaningful dialogue might produce a more meaningful dialogue and mutual compromises in order to bring about a better working relationship.</p> <p>f. Given how dynamic and fast-moving situations can be at the local level it is questionable whether or not setting a plan to cover 20 years is possible or even feasible so that it is fit for purpose.</p> <p>g. Some of the proposals in the Plan have already happened so the Plan appears to be retrospective – rather than forward looking. The same could be said of the housing allocations and provision – some have already been built so there is a confusion between what has been, what is, what is needed and what might/should be. Whilst the five year ‘banks’ for land and quantities of units might go some way to prevent evasion, it is important that the methodology is also fully understood and implemented into a workable rolling system.</p> <p>h. The system of local governance was outdated even in 1972 when it was introduced. However, the system still clings to 19th Century principles and rules. Some parish councils are particularly out of date even with those rules. Many parish councils do not have the policies to ensure they are acting legally or even democratically – a term which is losing its meaning. Increasingly it seems that governance has become so eroded, in some contexts it might no longer exist.</p> <p>i. Rules and overarching policies are often vague (if they exist) and are differentially interpreted within and between councils. Councillors appear to lack the necessary support to place things back on track. Chairs and Clerks can be equally and increasingly ill-equipped to deal with the kind of governance required in a 21 Century which appears to be controlled by the internet, social media and hearsay. Truth is rapidly losing its appeal.</p> <p>j. To inform the latest Plan perhaps there is a need to quantify the real successes (and failures) of its predecessor in order to avoid making the same mistakes in the next 20 year Plan period.</p>
<b>Comment ID</b>	NULLP1270
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EM1
<b>Q6 Details</b>	<p>6 Re Employment EMP 1-2</p> <p>a. The emphasis for employment appears to be based on location (just off the M6).</p> <p>b. Future developments seem to focus on logistics and warehousing. Although the plan claims that there is a need to encourage high end professional and technical personnel there would seem to be a distinct socio-economic divide between these two types of employment, particularly in the political discourse which would keep north Staffordshire low waged and low-skilled.</p> <p>c. There would appear to be a distinct culture and mindset in north Staffordshire which needs to be addressed if the two are to be reconciled both socially and economically. Provision of opportunities to obtain and improve qualifications and skills exist but concerns are being expressed that these are not being taken up to full advantage and capacity.</p> <p>d. The NBC in this Plan seems to accept a low wage, low-skilled ethos, which might be an investment attraction for some employers. However, this low aspiration serves to depress the area, rather than provide uplift. If the Plan is to produce a higher aspirational yardstick, then encouraging more of the same and taking the line of least resistance, will not do. The prevailing mind set and culture also need to change.</p>
<b>Comment ID</b>	NULLP1272
<b>Order</b>	92
<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EM1
<b>Q6 Details</b>	<p>7. Cycle Ways and Rights of Way Transport Infrastructure</p> <p>a. The development of both cycle ways and Rights of Way paths are commendable. In the Residents Association neighbourhood we have been waiting since 2008 for cycle ways to be fully installed on the</p>



	<p>nearby Burgess Brook housing estate. The TRA has been waiting for 17 years for Staffordshire County Council to legalise the existence of a threatened customary right of way.</p> <p>b. Planning Authorities need to ensure that when any development has taken place which has suspended the use of a right of way, that the right would be fully and properly restored once the development has been completed. Several have been lost since 1953, by not being included on the County's definitive rights of way map.</p> <p>c. That that there should be adequate resources earmarked for the upkeep and routine maintenance of the rights of way paths and for the repair of furniture on them – gates, stiles, board walks and bridges.</p> <p>d. It is important that the NBC ensures that all cycleways given approval in developments are fully implemented and are accessible to different types of bicycle along their route.</p> <p>e. Persons needing to use a mobility scooter would not have access unless they have disabled key access. This could prohibit use of the pathway.</p> <p>f. A similar situation applies to rural minibus schemes whereby users have to find their own drivers. Since users of the minibus are more likely than most to be over 70 years of age and no longer be driving, this would disadvantage the groups who would wish to use the scheme.</p> <p>g. Poor bus services in rural areas mean that use of cars is greater, and necessary. This will frustrate any transport plans to reduce the number of cars on the road.</p> <p>h. Perhaps the Plan needs to address such paradoxes.</p> <p>i. Perhaps there needs to be a separate Plan to address such paradoxes – ie that although need appears to be being addressed, it cannot be accessed.</p>
<b>Comment ID</b>	NULLP1263
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>PCD3 and 9 RET1, 4 Retail and service Issues:</p> <p>a. There are new large-scale developments proposed in this Plan (some suggested before 2019). It is difficult to know if these have now been secured or if they are still part of a wish list. Currently there are retail units which have never been wholly occupied (or have seen constant short-term turnover) in and around the town centre (York Place (1964), Lymelight Arcade (2014), the Roebuck Centre (1986) and the arcade linking Merrial Street with the Ironmarket (in 2000s?). Have the reasons for this phenomenon been factored into future developments, or the estimated suggested allocations, so that unnecessary demolition and destruction do not become part of the Plan? Formalising such practices as sustainable and acceptable processes are not necessarily the best use of resources, scarce or otherwise.</p> <p>b. Have the reasons for the demise of the town been sufficiently analysed and taken into account in order to avoid making the same mistakes?</p> <p>c. The former retail units mentioned above are now destined for demolition/partial demolition, with replacements advocated in the Plan. This should not be regarded as an acceptable or sustainable strategy and for the sake of complying with national government's overestimated allocations, and certainly not without factoring in up-to-date information. This is important in LAs where developable land is scarce, and where alternative uses might be preferable.</p> <p>d. The issue of car parking in and around Newcastle-under-Lyme town centre, which has not been satisfactorily resolved, has had an impact on retailing in an already declining and reduced retail offer. Developing the smaller car parks around the town might not be a good idea in the long term. The issue of car parking might have been reassessed to inform the plan in order to come to a better solution to encourage a larger footfall to the town centre.</p> <p>e. Online shopping and the changed behaviour of customers, evident before Covid, and more pronounced afterwards, has reduced the patronage of high street shops. The cross-cutting issues compounding the decline of the high Street need to be satisfactorily explored and resolved if the Plan is to be effective over the next 20 years.</p>
<b>Comment ID</b>	NULLP1267
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>5. The Issues of the Green Belt and the Countryside development - Sustainable Environment Policies and the issue of the 5 year supply of land for housing and employment and town centre uplift:</p> <p>a. In order to comply with NPPF rules and guidance, there are some LAs which might over-develop in order to avoid national government interference. This could lead not only to saturation but also to unnecessary encroachment into the green belt and/or countryside. The issue of the land (especially farmland) alienated by the HS2 project has not been dealt with or clarified given that so much land has been appropriated and taken out of commission from farms (the countryside (and the green belt)?) and may not be used again as farming land. If this is the case this will have been a back door enclosure of the countryside, cutting a swathe down the centre of England, and providing developers with land they have always wanted.</p> <p>b. The (Stones) Market is regularly 'improved' (revamped/reduced) but solutions have not led to its development or improvement, success and well being, only its decline. Given that the identity of Newcastle-under-Lyme is that of 'Market Town' this is becoming harder to justify. Developers would be aware of the difference between the statements and claims about Newcastle-under-Lyme (appearance) and its reality.</p> <p>c. It is only recently that the NBC has viewed itself as a University Town – which it has been for the past 75 years – an opportunity missed or possibly not even recognised?</p>

<b>Comment ID</b>	NULLP1300
<b>Order</b>	48
<b>Title</b>	Policy HOU4: Gypsy, Travellers and Travelling Showpeople
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU4
<b>Q6 Details</b>	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks Yours faithfully Dr A Drakakis-Smith Chair Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDENTS ASSOCIATION LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p>1. E Policy HOU 4:</p> <p>a. From the map produced it is difficult to see where the site locations are (the key and symbols are and too small to be usable and readable.</p> <p>b. RE Gypsy/Traveler Accommodation: This is a step in the right direction that land has finally been allocated for a site and that 5 extra pitches are suggested for the plan period.</p> <p>That said:</p> <p>c. It is concerning that the plan provision will not take effect until 2026 or later when the landfill ceases to collect waste. The families have lived (some of them next to this site since 1994). When the landfill site closes reconstitution will begin. This will involve the large-scale import of soil and other dust bearing materials, which could continue for possibly another 20 years (2046) and which will need suitable mitigation measures. Particulates smaller than 2.5 particulates have no acceptably safe limits re exposure. Limits, however, are imposed on levels of H2S exposure. (Perhaps this should have been considered in Local Plans when the landfill site was permitted in 1947 and subsequently when housing was being permitted ever closer to the site in 2004 which is ongoing.)</p> <p>d. The site that appears to be chosen is on land currently used to store waste white goods including fridges and other sundry contaminating materials. This would suggest that the land would be contaminated. The site would also be too close to the working surface of the landfill site as a permanent residence - ie across the road and within 80 metres. The original safe off-set limit for the housing site advocated by the EA was 250 meters. This was appealed and reduced to 100 m by Persimmon Homes in (2004) and more recently the off-set limit has been reduced to around 80m. The current Traveller site is within 49 m of the site.</p> <p>Given the issues that have arisen and that will arise after the site is closed to waste infilling, it will be imperative that the off-set limit of 250m be reinstated for any new development order to avoid serious issues over the next 20 years. This should be part of this plan.</p> <p>e. The former 9 hole golf course suggested by the TRA as a suitable site appears to have been ignored. It would be further away from this peri urban/semi -industrial fringe area of the borough, marked by Cemetery Road and the landfill site, which would be much more conducive to permanent and more sustainable residential use.</p> <p>f. The allocation over the plan period is for 5 pitches. At the moment there are around 16 families on the existing site. It is unclear if the 16 families are to be relocated to the new site and that the five pitches mentioned are to be graduated additions. There would seem to be little or no leeway for internal family growth or for transit families. Whilst guidance suggests that it is preferable for transit and resident families not share a site, this suggests that there might be no provision for transit families, which real data suggests is needed. This plan therefore would not provide the necessary accommodation for transit families.</p> <p>g. It was suggested that the currently used site be maintained as a short-term transit site for mobile families on a short term- agreed basis. Issues of health and safety</p>

	<p>notwithstanding.</p> <p>h. It was also suggested that the accommodation, if any is to be offered on site, and given that this is a site for permanent occupation, that it be more aspirational and in keeping with the aspirations of the Gypsy families who might aspire to more than a caravan. This could include more permanent structures if needed. The current legal, definitions which tie families to caravans or a way of life enforcing mobility rather than permanence within a chosen way of life might be construed as discriminatory. Given that other special needs groups are being given consideration in this Plan, then this plan policy would be limiting for Gypsy/Traveller families and, therefore, unsound because it would not be meeting the real as opposed to the assumed needs of this particular community.</p>
<b>Comment ID</b>	NULLP1302
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1 -7
<b>Q6 Details</b>	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks Yours faithfully Dr A Drakakis-Smith Chair Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDENTS ASSOCIATION LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p>RE Housing provision contained in Policies PSD1 - PSD 7 and with regard to housing allocations per borough/ward areas:</p> <p>a. The total allocations for the Borough has been increased from 5,000 units to 8,000. Under the changes to the NPPF rules, does this mean that national government has intervened to change the level of development that the NBC adopted based on the last consultation which took place for the last draft of the Plan?</p> <p>b. If the supporting documents are read and understood, these estimates are based on guestimates and over-estimates for some localities, which might include Newcastle Borough. The reliance for the estimates appears to be on the 2011 and 2021 (even the 2001 census is mentioned) census material. Some data had been updated to 2023 but seemed questionable. The post-Covid total population needs to be verified to be made part of any assessment in the interests of accuracy and unnecessary development.</p> <p>c. The issue of empty homes has not been mentioned, even though the number in this and other LAs would appear to be high. Pre- Covid, when enquiries were made of the NBC by the TRA, 1100 was a figure mentioned. Councils have all the necessary powers to bring such homes back into commission and resources should be allocated at both national and local levels to do this. This level of empty homes should not be regarded as acceptable or sustainable if there are shortages.</p> <p>d. Whilst the Plan makes some attempt to deal with the issue of affordable homes and social housing, whilst the term home (as a need) and house (as a commodity) are confused and left to the mercy of market forces to decide affordability, the issue will not be resolved, and need will not be satisfactorily met.</p> <p>e. Neither does the Plan factor in that the purchase of a house/home might be the easier part. The more difficult part is maintaining property so that it remains habitable and affordable.</p> <p>f. Does the LA know how many homes have been</p>

	<p>repossessed? Or how many residents have abandoned private ownership in favour of public or private rental as a more affordable option?</p> <p>g. In Newcastle-under-Lyme student flats and bedsits have been favoured over other types of housing. This Plan suggests it might perpetuate those kinds of development when other types are needed. Some student developments have already 'extended' their criteria to other users, since take up has not been as high as expected.</p> <p>h. Providing affordable homes, therefore, is not a standalone issue although it would appear that cross-cutting issues have been ignored, or not considered. Additional updated data and analysis are needed to ensure sound decision-making and effective solutions that transcend any political influences, allowing for more objective and sustainable outcomes necessary</p>
<b>Comment ID</b>	NULLP1306
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p><b>RE the Draft Local Plan Consultation</b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks</p> <p>Yours faithfully</p> <p>Dr A Drakakis-Smith</p> <p>Chair</p> <p>Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDENTS ASSOCIATION</p> <p>LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>5. The Issues of the Green Belt and the Countryside development - Sustainable Environment Policies and the issue of the 5 year supply of land for housing and employment and town centre uplift:</b></p> <p>a. In order to comply with NPPF rules and guidance, there are some LAs which might over-develop in order to avoid national government interference. This could lead not only to saturation but also to unnecessary encroachment into the green belt and/or countryside. The issue of the Land (especially farmland) alienated by the HS2 project has not been dealt with or clarified given that so much land has been appropriated and taken out of commission from farms (the countryside (and the green belt?)) and may not be used again as farming land. If this is the case this will have been a back door enclosure of the countryside, cutting a swathe down the centre of England, and providing developers with land they have always wanted.</p> <p>b. The (Stones) Market is regularly 'improved' (revamped/reduced) but solutions have not led to its development or improvement, success and well being, only its decline. Given that the identity of Newcastle-under-Lyme is that of 'Market Town' this is becoming harder to justify. Developers would be aware of the difference between the statements and claims about Newcastle-under-Lyme (appearance) and its reality.</p> <p>c. It is only recently that the NBC has viewed itself as a University Town- which it has been for the past 75 years - an opportunity missed or possibly not even recognised?</p>
<b>Comment ID</b>	NULLP1311
<b>Order</b>	92

<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN4
<b>Q6 Details</b>	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks</p> <p>Yours faithfully</p> <p>Dr A Drakakis-Smith</p> <p>Chair</p> <p>Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDENTS ASSOCIATION</p> <p>LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>7. Cycle Ways and Rights of Way Transport Infrastructure</b></p> <p>a. The development of both cycle ways and Rights of Way paths are commendable. In the Residents Association neighbourhood we have been waiting since 2008 for cycle ways to be fully installed on the nearby Burgess Brook housing estate. The TRA has been waiting for 17 years for Staffordshire County Council to legalise the existence of a threatened customary right of way.</p> <p>b. Planning Authorities need to ensure that when any development has taken place which has suspended the use of a right of way, that the right would be fully and properly restored once the development has been completed. Several have been lost since 1953, by not being included on the County's definitive rights of way map.</p> <p>c. That there should be adequate resources earmarked for the upkeep and routine maintenance of the rights of way paths and for the repair of furniture on them - gates, stiles, board walks and bridges.</p> <p>d. It is important that the NBC ensures that all cycleways given approval in developments are fully implemented and are accessible to different types of bicycle along their route.</p> <p>e. Persons needing to use a mobility scooter would not have access unless they have disabled key access. This could prohibit use of the pathway.</p> <p>f. A similar situation applies to rural minibus schemes whereby users have to find their own drivers. Since users of the minibus are more likely than most to be over 70 years of age and no longer be driving, this would disadvantage the groups who would wish to use the scheme.</p> <p>g. Poor bus services in rural areas mean that use of cars is greater, and necessary. This will frustrate any transport plans to reduce the number of cars on the road.</p> <p>h. Perhaps the Plan needs to address such paradoxes.</p> <p>i. Perhaps there needs to be a separate Plan to address such paradoxes - ie that although need appears to be being addressed, it cannot be accessed.</p>
<b>Comment ID</b>	NULLP1304
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith



Consultee Given Name	Angela
Q4 Part of document	Policy
Q4 Policy	RET1
Q6 Details	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks Yours faithfully Dr A Drakakis-Smith Chair Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDENTS ASSOCIATION LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>4. PCD3 and 9 RET1, 4 Retail and service Issues:</b></p> <p>a. There are new large-scale developments proposed in this Plan (some suggested before 2019). It is difficult to know if these have now been secured or if they are still part of a wish list. Currently there are retail units which have never been wholly occupied (or have seen constant short-term turnover) in and around the town centre (York Place (1964), Lymelight Arcade (2014), the Roebuck Centre (1986) and the arcade linking Merrial Street with the Ironmarket (in 2000s?). Have the reasons for this phenomenon been factored into future developments, or the estimated suggested allocations, so that unnecessary demolition and destruction do not become part of the Plan? Formalising such practices as sustainable and acceptable processes are not necessarily the best use of resources, scarce or otherwise.</p> <p>b. Have the reasons for the demise of the town been sufficiently analysed and taken into account in order to avoid making the same mistakes?</p> <p>c. The former retail units mentioned above are now destined for demolition/partial demolition, with replacements advocated in the Plan. This should not be regarded as an acceptable or sustainable strategy and for the sake of complying with national government's overestimated allocations, and certainly not without factoring in up-to-date information. This is important in LAs where developable land is scarce, and where alternative uses might be preferable.</p> <p>d. The issue of car parking in and around Newcastle-under-Lyme town centre, which has not been satisfactorily resolved, has had an impact on retailing in an already declining and reduced retail offer. Developing the smaller car parks around the town might not be a good idea in the long term. The issue of carparking might have been reassessed to inform the plan in order to come to a better solution to encourage a larger footfall to the town centre.</p> <p>e. Online shopping and the changed behavior of customers, evident before Covid, and more pronounced afterwards, has reduced the patronage of high street shops. The crosscutting issues compounding the decline of the high Street need to be satisfactorily explored and resolved if the Plan is to be effective over the next 20 years.</p>
Comment ID	NULLP1310
Order	69
Title	Policy EMP2: Existing Employment Sites
Consultee Company / Organisation	Thistleberry Residents Association
Consultee Position	Chair
Consultee Family Name	Drakakis-Smith
Consultee Given Name	Angela
Q4 Part of document	Policy
Q4 Policy	EMP2

<b>Q6 Details</b>	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks Yours faithfully Dr A Drakakis-Smith Chair Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDETNS ASSOCIAITON LOCAL PIAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>6. RE Employment EMP1-2</b></p> <p>a. The emphasis for employment appears to be based on location (just off the M6).</p> <p>b. Future developments seem to focus on logistics and warehousing. Although the plan claims that there is a need to encourage high end professional and technical personnel there would seem to be a distinct socio-economic divide between these two types of employment, particularly in the political discourse which would keep north Staffordshire low waged and low-skilled.</p> <p>c. There would appear to be a distinct culture and mindset in north Staffordshire which needs to be addressed if the two are to be reconciled both socially and economically. Provision of opportunities to obtain and improve qualifications and skills exist but concerns are being expressed that these are not being taken up to full advantage and capacity.</p> <p>d. The NBC in this Plan seems to accept a low wage, low-skilled ethos, which might be an investment attraction for some employers. However, this low aspiration serves to depress the area, rather than provide uplift. If the Plan is to produce a higher aspirational yardstick, then encouraging more of the same and taking the line of least resistance, will not do. The prevailing mind set and culture also need to change.</p>
<b>Comment ID</b>	NULLP1308
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP1
<b>Q6 Details</b>	<p><b><u>RE the Draft Local Plan Consultation</u></b></p> <p>Please find enclosed a hard copy of the TRA submission to the Local Plan Consultation. Apologies that it is not on the proforma, but the proforma did not provide the space for issues that the TRA wanted to address and which it was of the view needed to be addressed if this Plan was to be considered sound.</p> <p>It is hopeful that the comments made and issues raised will be helpful and assist this plan in reaching a sound footing to cover the next 20 years.</p> <p>Many thanks Yours faithfully Dr A Drakakis-Smith Chair Thistleberry Residents Association</p> <p>THISTLEBERRY RESIDETNS ASSOCIAITON LOCAL PIAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>6. RE Employment EMP1-2</b></p> <p>a. The emphasis for employment appears to be based on location (just off the M6).</p> <p>b. Future developments seem to focus on logistics and warehousing. Although the plan claims that there is a need to encourage high end professional and technical personnel there would seem to be a distinct socio-economic divide between these two types of employment, particularly in the political discourse which would keep north Staffordshire low waged and low-skilled.</p>

	<p>c. There would appear to be a distinct culture and mindset in north Staffordshire which needs to be addressed if the two are to be reconciled both socially and economically. Provision of opportunities to obtain and improve qualifications and skills exist but concerns are being expressed that these are not being taken up to full advantage and capacity.</p> <p>d. The NBC in this Plan seems to accept a low wage, low-skilled ethos, which might be an investment attraction for some employers. However, this low aspiration serves to depress the area, rather than provide uplift. If the Plan is to produce a higher aspirational yardstick, then encouraging more of the same and taking the line of least resistance, will not do. The prevailing mind set and culture also need to change.</p>
<b>Comment ID</b>	NULLP1312
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Company / Organisation</b>	Thistleberry Residents Association
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Drakakis-Smith
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q6 Details</b>	<p>THISTLEBERRY RESIDENTS ASSOCIATION LOCAL PLAN SUBMISSION</p> <p>The Thistleberry Residents Association wishes to submit the following comments and thoughts on what will hopefully be the final draft of the Local Plan and in the following way:</p> <p><b>8. The Future of the Plan System</b> <b>Although this is not contained within the remit of the Plan it might be the time to introduce such concepts in order to deal with the issues that prevent plans from a) being drawn up in a timely manner and b) from being implemented with good will, and in a timely manner.</b></p> <p>a. After reading the Plan it seems to be not necessarily a ground-up Plan in forward planning, but an attempt to fulfil all the legal, national, government requirements which have been imposed, using the tick-box vocabulary.</p> <p>b. It would appear that within LAs that there are short-term enthusiasms for projects which wears off as new projects are streamed. Enthusiasm seems to equate with levels of resources invested. This also means that some projects are not actually needed or required and add little value.</p> <p>c. The new NPPF rules reveal the tensions between national government and local authorities, particularly in the areas of control of development and resources.</p> <p>d. Local Authorities seem to have evolved their own ways of doing things which means that either practices and procedures need to be standardised, or that one size does not fit all and that each local council needs to formulate its own plan with reference to its unique needs without the interference of national government with national government being the final scrutineer/arbitrator. However, this might need a new and different kind of Councillor and MP.</p> <p>e. It would seem that, currently, national and local government might not be on the same wavelength. It seems that in some cases, national government is a driving force for implementation of its own wish lists, and that Local Government is a line of resistance with ideas of its own. A more collaborative and meaningful dialogue might produce a more meaningful dialogue and mutual compromises in order to bring about a better working relationship.</p> <p>f. Given how dynamic and fast-moving situations can be at the local level it is questionable whether or not setting a plan to cover 20 years is possible or even feasible so that it is fit for purpose.</p> <p>g. Some of the proposals in the Plan have already happened so the Plan appears to be retrospective - rather than forward looking. The same could be said of the housing allocations and provision - some have already been built so there is a confusion between what has been, what is, what is needed and what might/should be. Whilst the five year 'banks' for land and quantities of units might go some way to prevent evasion, it is important that the methodology is also fully understood and implemented into a workable rolling system.</p> <p>h. The system of local governance was outdated even in 1972 when it was introduced. However, the system still clings to 19th Century principles and rules. Some parish councils are particularly out of date even with those rules. Many parish councils do not have the policies to ensure they are acting legally or even democratically - a term which is losing its meaning. Increasingly it seems that governance has become so eroded, in some contexts it might no longer exist.</p> <p>i. Rules and overarching policies are often vague (if they exist) and are differentially interpreted within and between councils. Councillors appear to lack the necessary support to place things back on track. Chairs and Clerks can be equally and increasingly ill-equipped to deal with the kind of governance required in a 21st Century which appears to be controlled by the internet, social media and hearsay. Truth is rapidly losing its appeal.</p> <p>j. To inform the latest Plan perhaps there is a need to quantify the real successes (and failures) of its predecessor in order to avoid making the same mistakes in the next 20 year Plan period.</p>

<b>Comment ID</b>	NULLP26
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Dunlevy
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Dear Sir or Madam, I am writing to express my objection to the inclusion of the land on Muckleston Wood Lane LW53 for future housing development for the following reasons:</p> <p>The draft plan is not sound in relation to "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1 LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ul style="list-style-type: none"> <li>• The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> </li> </ol> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>2(i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.</p> <p>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>6 Policy PSD3: Distribution of Development (page 16)</p> <p>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p>

	<p>1 Conclusion</p> <p>7(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council’s Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>7(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council’s Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP27
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Dunlevy
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Dear Sir or Madam, I am writing to express my objection to the inclusion of the land on Muckleston Wood Lane LW53 for future housing development for the following reasons:</p> <p>The draft plan is not sound in relation to “Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads”. This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 (“the NPPF 2023”).</p> <p>I also challenge the soundness of the draft local plan with regard to “Policy PSD3: Distribution of Development” (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1 LW53 is not a “sustainable location” for future housing development and is therefore contrary to national policy. This view was endorsed by the Council’s Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ul style="list-style-type: none"> <li>• The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> </li> </ol> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council’s own evidence document namely, the “Rural Area Topic Paper “(June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>“Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities”.</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <ol style="list-style-type: none"> <li>1 (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council’s Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. <ol style="list-style-type: none"> <li>1 LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council’s Planning Committee as part of the reasoning for the refusal of housing on this site.</li> <li>2 The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council’s Planning Committee as part of the reasoning for the refusal of housing on this site.</li> </ol> </li> </ol>

	<p>6. Policy PSD3: Distribution of Development (page 16)</p> <p>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>1 Conclusion</p> <p>7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>



<b>Comment ID</b>	NULLP193
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	EVANS
<b>Consultee Given Name</b>	DEBRA
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>MY HOME IS [redacted by admin] IT IS OVER 100 YRS OLD AND IS PINNED WITH THE BARS THROUGH THE HOUSE DUE TO PREVIOUS MINING, THE HOUSES HAVE MOVED IN THE [redacted by admin] YRS I HAVE LIVED HERE (ALL 7 HOUSES ARE THE SAME) WE HAVE RECEIVED NO INFORMATION WHATSOEVER AND FOUND OUT ABOUT THE PROPOSALS BY ACCIDENT VIA AN UNCONNECTED FACEBOOK GROUP, WE HAVE BEEN TOTALLY IGNORED</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP229
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	EVANS
<b>Consultee Given Name</b>	DEBRA
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be</p>

seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

Comment ID	NULLP330
Order	30
Title	Policy PSD5: Green Belt
Consultee Family Name	Edge
Consultee Given Name	Katie
Q4 Part of document	Policy
Q4 Policy	PSD5
Q5 Legally compliant	No
Q5 Sound	No
Q6 Details	<p>Green belt is finite and irreplaceable and 'safeguards the countryside from encroachment'. The National Planning Policy Framework states that 'the government attaches great importance to Green Belt'. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence and The NPPF states that there must be 'exceptional circumstance' for altering the Green Belt boundaries. I do not believe that NULBC can justify the 'exceptional circumstances' required to release Green Belt land.</p> <p>The <i>NPPF paragraph 146</i> asserts that the strategic policy-making authority should first fully examine all other reasonable options for meeting development need before using Green Belt land including making 'as much use as possible of suitable brownfield sites and underutilised land;'. The <i>Campaign to Protect Rural England State of Brownfield Report 2022</i> states: 'the availability of previously developed land continues to grow across England' and found that 'over 1.2 million homes could be built on 23,000 sites covering more than 27,000 hectares of brownfield'. Building on Green Belt land cannot be justified with so many brownfield sites available nationally.</p> <p>We should also be focused on making sure that developments that have already been granted permission are completed promptly rather than starting more and eating into Green Belt land. It is estimated that there are currently 1 million houses with planning permission but remain unbuilt. <u><i>National Empty Homes Week 2023 sees call for action on One Million homes nobody lives in</i></u></p> <p>How can there be 'exceptional circumstances' for developing on Green Belt land when there are so many other sites available nationally? This is not justified and therefore not sound.</p> <p><i>NPPF Paragraph 146</i> further states that before developing Green Belt land that the strategic policy-making authority should also examine 'whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport;'. We should be concentrating on developing and regenerating our town and city centres. With high street shops shutting down regularly and leaving many empty premises these areas are in need of attention now. Repurposing some of these buildings/land for employment or housing needs could help to increase footfall for the remaining businesses whilst also alleviating some of the pressure to find new sites to develop. One of the original purposes of Green Belt protection was to aid urban regeneration by focusing development on</p>

urban land. Renovate derelict homes and build the homes that already have planning permission first.

Green belt is not distributed evenly across the country therefore, if it is being reviewed, then it should be reviewed nationally as a whole and not chipped away at in multiple locations to meet local targets. If NULBC has a higher percentage of Green Belt land than another borough then this should be taken into consideration and protected for the benefit of everyone nationally. Some areas that are designated as Green Belt are 'poor environmental and visual quality' (*Landscape Briefing April 2018 Green Belt Policy*) so it would be beneficial to take a view nationally to protect sites that make a stronger contribution regarding land quality; to protect areas with a higher percentage of quality Green Belt.

Loss of natural capital does not just have a local effect. Destruction of good quality agricultural land, climate change and the loss of wildlife habitats and biodiversity impacts everyone. The *NPPF Paragraph 20* states that Strategic policies should make sufficient provision for: 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation'. We need to restore nature and combat climate change by restoring natural capital and not chipping away at it further. Previously undeveloped land such as the proposed huge 80 hectares AB2 site is crucial in its role as a natural carbon storage area. The *Sustainability Appraisal published prior to consultation in 2023* noted that some of the negative effects that we could experience if the development goes ahead: *Paragraph 5.2.21* discussed how rural based options 'may have a negative impact on climate change as they would encourage the use of private vehicles for travel and so potentially increase GHG emissions, contributing towards the causes of climate change to a greater extent'.

The *Sustainability Appraisal* also acknowledged the impact that development would have on the air quality in Audley where reliance on private car usage potentially increasing air pollution levels and having a negative effect on local air quality (*paragraph 5.2.3*).

As a nation we also should be conscious of working towards food security and recognise the food production value of farmland. 'Best and Most Versatile' land is defined as grades 1-3a in the Agricultural Land Classification. If Strategic site AB2 goes ahead it would mean a massive loss of 80ha of Green Belt of which much is grade 3a agricultural land. This land would be better utilised for food production.

As well as the loss of agricultural land, the proposed Green Belt development will have a devastating effect on local wildlife by destruction of their habitat and hunting grounds. The area is disconnected so it would mean a loss of open countryside and would also impact the surrounding land with light, noise and air pollution.

*The Environment Act 2021* states that the government is required by law to halt the decline of wildlife by 2030. How can this be achieved if good quality, undeveloped land is eaten up by warehousing and housing?

The land owner at AB2 has been receiving public funding to encourage wildlife friendly farming. The 3b land on the site provides habitat for wildlife and if developed then this public investment will be lost. There are also many historic protected hedgerows (visible on victorian maps). These hedgerows need to exist within the protection of greenbelt and not line car parks or housing estates as they will no longer provide safe habitats for wildlife. Wildlife noted on this site along with the other proposed Green Belt site AB12 includes: Barn Owls, Tawny Owls, Buzzards, Kestrels, Hares, Badgers, Foxes, Hedgehogs, Bats and Shrews. Full wildlife surveys should be undertaken before any development is permitted.

All other possibilities should be explored before encroaching on Green Belt land in order to be able to meet requirements for exceptional circumstances to release Green Belt. However if there is a shortage of brownfield sites then the Green Belt assessment should be used to identify the sites with weaker Green Belt contribution and use them first. The *Green belt assessment part 2* graded the contender sites and identified weak and moderate sites. It should only have been these sites that were taken through to the next stage; however proposed local housing sites AB12, AB33 and TK10 were all assessed as having a strong contribution to the Green Belt but are now included in the local plan. Whereas there are examples of 'moderate contribution' sites that were not taken further e.g. AB22 Wall Farm. Wall Farm was also previously advertised for development under the RENEW scheme and has good road access. AB78/79 was rejected from the contender sites but land included in that site has now been submitted as a planning application for 39 houses (NEW FARM, Cross Lane) yet this land is not listed as a preferred site. It is also worth noting that, if these planning permissions were to be granted, then they would extend up to the AB12 site and therefore would join up to form a much larger encroachment on the countryside. There does not seem to be a consistent approach to site allocation and this is unsound.

The previous *Sustainability Appraisal Table 7.4* outlined reasons for selection/rejection of sites - such reasons for rejection include poor access, strong contribution to Green Belt or being valuable as agricultural land. AB12 also has these same restrictions but was still determined as a preferred site. This land is owned by Staffordshire County Council - did the ownership of the land have a bearing on the decision? If so then this would be a bias within the selection process. The Sustainability report has been updated and now the information is practically inaccessible as no one, with a job and responsibilities, has time within the 6 week consultation to read all 675 to find the relevent points!

<b>Q7 Modification</b>	Develop brownfield sites first nationally Build houses which already have planning permission first. Adhere to greenbelt assessments of sites and use weaker areas first.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP333
<b>Order</b>	149



Title	Policy AB12 Land East of Diglake Street
Consultee Family Name	Edge
Consultee Given Name	Katie
Q4 Part of document	Policy
Q4 Policy	Policy AB12 Land East of Diglake Street
Q5 Legally compliant	No
Q5 Sound	No
Q6 Details	<p>The <i>NPPF paragraph 146</i> asserts that the strategic policy-making authority should first fully examine all other reasonable options for meeting development need before using Green Belt land including making 'as much use as possible of suitable brownfield sites and underutilised land;'. The <i>Campaign to Protect Rural England State of Brownfield Report 2022</i> states: 'the availability of previously developed land continues to grow across England' and found that 'over 1.2 million homes could be built on 23,000 sites covering more than 27,000 hectares of brownfield'. Building on Green Belt land cannot be justified with so many brownfield sites available nationally.</p> <p>We should also be focused on making sure that developments that have already been granted permission are completed promptly rather than starting more and eating into Green Belt land. It is estimated that there are currently 1 million houses with planning permission but remain unbuilt. <u><i>National Empty Homes Week 2023 sees call for action on One Million homes nobody lives in</i></u></p> <p>How can there be 'exceptional circumstances' for developing on Green Belt land when there are so many other sites available nationally? This is not justified.</p> <p>All other possibilities should be explored before encroaching on Green Belt land in order to be able to meet requirements for exceptional circumstances to release Green Belt. However if there is a shortage of brownfield sites then the Green Belt assessment should be used to identify the sites with weaker Green Belt contribution and use them first. The <i>Green belt assessment part 2</i> graded the contender sites and identified weak and moderate sites. It should only have been these sites that were taken through to the next stage; however proposed local housing sites AB12, AB33 and TK10 were all assessed as having a strong contribution to the Green Belt but are now included in the local plan. Whereas there are examples of 'moderate contribution' sites that were not taken further e.g. AB22 Wall Farm. Wall Farm was also previously advertised for development under the RENEW scheme and has good road access. AB78/79 was also rejected from the contender sites but land included in that site has now been submitted as a planning application for 39 houses (NEW FARM, Cross Lane) yet this land is not listed as a preferred site. It is also worth noting that, if this planning permission were to be granted, then the properties at Cross Lane would extend almost up to the AB12 site and therefore would join up to form a much larger encroachment on the countryside. The process of site allocation is not consistent and therefore not sound. This land is owned by Staffordshire County Council: did the ownership of the land have a bearing on the decision? If so then this would be an unethical bias within the selection process.</p>

*Paragraph 20 National Planning Policy Framework* states that Strategic policies should make sufficient provision for: infrastructure (including for transport) and for community facilities such as health and education. These extra dwellings in Bignall End, along with AB33 and AB15 would have a very detrimental effect on the infrastructure of the local area and for this reason they are not positively prepared. With the national average household in the UK at 2.4 people in the UK, this means that the 213 extra dwellings planned in Audley Parish means 500+ extra people.

As there is only one GP surgery and dental practice in the area, it is to be expected that healthcare provision will suffer due to more demand. If the extra residents are unable to register for local health care then more travel is required to access services further away.

The *Local Plan* states that educational attainment for the area is below national average (*Paragraph 3.19*) and the additional students from proposed housing in Audley and neighbouring Red Street will put additional pressure on educational infrastructure. The previous document released at the Consultation 2023 '*Draft Infrastructure Delivery Plan*' stated that none of the three schools in this rural area can be expanded and that 'To fully mitigate the proposed new housing, it is predicted that further educational infrastructure would be required' (paragraph 3.106). It also stated that nearby sites TK30 and CT1 would trigger the requirement for a new primary school (paragraph 3.104). These findings have now been removed from the final Infrastructure Delivery plan but no new schools have been provided in the area? Extending the current primary school (Ravensmead) would mean encroaching further into the greenbelt. There is no provision of land set aside for this in the plan.

The proposed development in Audley and surrounding villages will increase the traffic on it's already struggling roads. The average cars per household in the UK is 1.2 however this figure may well be higher in Audley due to the rural nature of the area and limited public transport; the proposed 213 extra dwellings in Audley alone would generate at least 255 more cars. The main route through Audley and Bignall End is the B5500. The stretch of B5500 from The Plough (Ravens Lane) to the Roundabout at Alsager road cannot support any more traffic due to parked cars at frequent points due to terraced housing. This cannot be altered due to the nature of the housing on the street. The road integrity at the Mini Roundabout at BB5500 Nantwich/Alsager Road is already struggling with heavy use and has many potholes.

This is before even considering the additional dwellings proposed in neighbouring areas such as 530 dwellings at Red Street (CT1). It is to be expected that people will use the B5550 in Audley as a cut through rather than using the congested stretch of A500 between the A34 at Talke and M6 Junction 16.

Audley AB12 site alone has a proposed 125 dwellings with at least 150 extra cars (more realistically at least 250 due to the rural nature of the site) trying to access the housing estate. The proposed vehicular access route via Diglake Street cannot support the extra traffic due to

parked cars on both sides of the street (see attached photos). The road is so narrow that residents have to park on the pavement which blocks pedestrian access. Pedestrians are required to walk on the road, which is already unsafe considering disabled access and access for families/young children, but the additional traffic will make this very dangerous. The proposed solution is a car park included in the AB12 site for existing local residents but this is just not fair or practical to expect disabled residents or those with young children to park so far from their homes. AB12 had previously been marked as 'unsuitable' for housing back in 2022 reports for this reason. The junction into Diglake Street from the B5500 is also only a few metres away from a nursery (Pear Tree) and is also used as the walking route for local families to and from the local primary school (Ravensmead). The school have already expressed concerns regarding the access/parking issues:

[https://www.facebook.com/story.php?story\\_fbid=838955951783401&id=100070070118788](https://www.facebook.com/story.php?story_fbid=838955951783401&id=100070070118788)

The alternative proposed emergency entrance into AB12 from Ravens Lane is on a bend where the road is a heavily congested area of single file traffic due to parked cars (terraced properties) and with the increased traffic from employment sites AB2 on this route this is only going to get worse.

For these reasons AB12 is not a deliverable site and has not been positively prepared and is therefore not sound.

[Admin Note. A number of photographs were included in this representation highlighting car parking and highways concerns on the B5500 Junction with Chapel Lane / Diglake Street and B5500 Ravens Lane].

<b>Q7 Modification</b>	Remove AB12 from the local plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6387241
<b>Q10 File 2</b>	6387282
<b>Q10 File 3</b>	6387263
<b>Attachments</b>	<a href="#">Diglake Street - entrance to AB12.pdf</a> <a href="#">B5500 Ravens Lane emergency entrance to AB12.pdf</a> <a href="#">B5500 junction with Chapel Lane-Diglake Street.pdf (1)</a>
<b>Comment ID</b>	NULLP423
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Edge
<b>Consultee Given Name</b>	Katie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	If Strategic site AB2 goes ahead it would mean a massive loss of 80ha of Green Belt of which much is grade 3a agricultural land. This would also have a devastating effect on local wildlife by destruction of their habitat and hunting grounds. The area is disconnected from the village so it would mean a loss of open countryside and would also impact the surrounding land with light, noise and air pollution. <i>The Environment</i>

*Act 2021* states that the government is required by law to halt the decline of wildlife by 2030.

The land owner at AB2 has been receiving public funding to encourage wildlife friendly farming. The 3b land on the site also provides habitat for wildlife and if developed then this public investment will be lost. There are also many historic protected hedgerows (visible on Victorian maps). These hedgerows need to exist within the protection of greenbelt and not line car parks or housing estates as they will no longer provide safe habitats for wildlife. Full wildlife surveys should be undertaken before any development is permitted.

Undeveloped land such as the proposed huge 80 hectares AB2 site is also crucial in its role as a natural carbon storage area vital for preventing climate change. The development of this site would also see a rise in noise, light and air pollution which would further affect local wildlife and the health and well-being of residents.

The massive development proposed at AB2 would dramatically alter Audley Parish. *NPPF paragraph 22* states that, 'Where larger-scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery'. The strategic location proposed for Audley would justify a longer timescale for delivery as it is a significant size in relation to the village and would not be deliverable within the local plan and is therefore not sound.

The infrastructure in the area is insufficient to support AB2 – the plan is not positively prepared and therefore not sound. Strategic location AB2 alone is proposing 2-3k jobs which means 2-3k more cars. The proposed slip road off the A500 is in a section of road which is already frequently congested.

The plan proposes all logistics traffic will use the A500 but local workers may use the proposed emergency access roads which are narrow lanes or pass through Audley using the B5500. Due to the rural location of the AB2 site it is unlikely that employees will walk or cycle to work (especially with the hilly nature of the environment) and, with a lack of public transport, there will be a massive increase in traffic through the village. *The Levelling up bill Chapter 7 paragraph 3* seeks to promote development locations, and designs and layouts, that contribute to healthier lifestyles, energy and resource efficiency consumption, for example by reducing the need to travel, increasing public transport connectivity and accessibility and promoting active travel i.e. walking, wheeling and cycling; This could potentially lead to congestion on the main roads back into Newcastle as residents commute to employment sites.

B5500 Nantwich/Alsager Road is already used as a cut through to avoid the congestion on the A500 as there is frequently a queue on A500 back from J16 to Audley slip road in morning rush hour. The B5500 (New Road/Ravens Lane) through Bignall End would also see an increase in traffic from both AB2 and housing developments AB12, AB15 and AB33- the B5500 Ravens Lane is a residential area with terraced houses and a lot of on street parking which is already

congested and frequently single file past parked cars (this is also school route). The proposed Emergency roads from AB2 are narrow country lanes with no pavements or street lighting.

Paragraph 3.17 states that unemployment in the borough is 2.9% which is lower than the regional average of 3.7% so that would raise the question of whether there is even a need for such large employment sites. The jobs provided by warehousing sites are also likely to be low paid jobs with only a few higher paid jobs which will attract commuters from further afield due to location near to M6 Junction 16. The total land being released from green belt across the borough for employment exceeds the recommendation. For example 80ha is being taken from Audley for 22ha requirement. If other developments in progress in neighbouring boroughs at Etruria, Radway Green and Crewe are considered then there is a potential for the massive site to be constructed and not fully utilised. This does not justify an exceptional circumstance for releasing Green Belt and the plan is not sound.

The plan for employment is not justified as it proposes more land to be used than recommended so will this just lead to calling for further housing development to rebalance employment/housing ratio.

<b>Q7 Modification</b>	Remove site AB2 from the local plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP417
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Edwards
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Although the policy states a wide range of commercial activities for this site. Given its location and the history of the development similar local sites such as Trentham Lakes, Lymedale and Chatterley Valley, the economic reality of the situation is that this site would be developed for mainly warehousing and distribution facilities, not high tech facilities providing well paid employment.</p> <p>A survey by conducted by Glassdoor of 2,995 employees in August 2024 found that the average annual salary for a warehouse worker in the UK was just £20,295, According to Forbes based on ONS annual survey data, the average annual salary in the UK is £34,464.</p> <p>This site will provide low paid employment of a type which already provides a good proportion of the employment opportunities locally. This area needs better quality opportunities in order to build its economy, support its town centres and improve the quality of life of its residents.</p> <p>The consultation documentation has stated that between 2,700 and 3,300 jobs are expected to be created. A study by Prologis in 2018 found that on average warehousing creates 1 job per 95 square metres. Based on 220,000 sq metres of units that equates to around 2,300 jobs. So the likelihood is that it won't create the number of jobs that is being put forward to support the development.</p> <p>The necessity for this development is questionable. Lymedale, Chatterley Valley and Trentham Lakes are still not fully developed decades after the creation of these sites commenced.</p> <p>The viability and sustainability of this site also needs consideration. Lymedale, Chatterley Valley and Trentham Lakes all have population centres close by providing a pool of potential employees. This site is more remote, people will not be able to afford to travel for these poorly paid jobs. There is presently no public transport serving this location. Although the plan makes reference to a travel plan being required, the reality is that public transport provision in this area is declining rather than improving evidenced by the recent removal of the No.4 bus route.</p> <p>Once land is built upon, generally it remains built upon forever thereafter. Is it worth losing our green fields for good to create the type of jobs that the area doesn't need? I would challenge this policy on the basis that it is <b>not justified</b>.</p>
<b>Q7 Modification</b>	This policy should be removed and the land should remain agricultural
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP1410
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Edwards
<b>Consultee Given Name</b>	Sybil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b> Infrastructure cannot take any more traffic, pollution, wildlife</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1354
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Edwards
<b>Consultee Given Name</b>	Sybil
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b> <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a</p>

	<p>footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP610
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Staffordshire Police
<b>Consultee Family Name</b>	Elkington
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Point 6 of PSD7 concludes with "Design should incorporate the Secured by Design Principles". While undoubtedly welcomed, it is considered that in the light of paragraphs 96(b) and 135(f) of the NPPF, the Local Plan could and should go further in promoting development that reduces criminal and anti-social opportunity, the fear of crime, and promotes community safety.
<b>Q7 Modification</b>	<p>It is recommended that Point 6 concludes as follows:</p> <p>"Design should incorporate Secured by Design Principles and in terms of layout and physical security, conforms to the guidance in the respective Secured by Design design guides".</p> <p>-----</p> <p>The Supporting Information Paragraph 5.46 concludes as follows - "Secured by Design seeks to deliver effective crime prevention and security standards".</p> <p>While welcomed, it is recommended that the following alternative form of word is used -</p> <p>"Secured by Design principles and design guides aim to deliver more secure, safer and sustainable communities and developments by reducing the opportunity for crime, anti-social behaviour and the fear of crime including promoting the adoption of appropriate security features and standards".</p> <p>-----</p> <p>Under Related Documents is the following:</p> <p>"Secured by Design, Policy Crime Prevention Initiatives Limited"</p> <p>While welcomed, the word 'Policy' is incorrect - it should say 'Police'.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP614
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Staffordshire Police
<b>Consultee Family Name</b>	Elkington
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	In the light of paragraphs 96(b) and 135(f) of the NPPF, the Local Plan could and should promote the adoption of housing standards which offer greater resistant to criminal and anti-social attention, and are inherently safer.
<b>Q7 Modification</b>	<p>It is recommended that the Local Plan incorporates the following as a third point under HOU3 Housing Standards:</p> <p>Compliance with the site layout guidance, and recommended building security features and minimum physical security standards contained with the Secured by Design Homes Guide is actively encouraged as a means to reduce criminal and anti-social opportunity within development, and contribute towards a safer living environment.</p> <p>-----</p> <p>As Supporting Information, the following is suggested:</p> <p>"The Secured by Design Homes Guide provide best practice guidance to the design, developer and construction sectors in relation to crime prevention layout and physical security considerations (amongst</p>

	other things) for a wide range of new build and refurbishment residential settings including apartment blocks with communal entrances serving different numbers of units, featuring basement parking etc. The Homes Guide is periodically updated with the current live version available on the Secured by Design website."
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP612
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Staffordshire Police
<b>Consultee Family Name</b>	Elkington
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Point 3 states - "Provision for secure, high quality Heavy Goods Vehicle lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. The management and operation arrangements for the lorry park provision to be agreed with National Highways in consultation with Staffordshire County Council."</p> <p>While incorporation of the word 'secure' is undoubtedly welcomed, this is open to interpretation. HGV parking facilities such as those at Motorway Service Areas on the M6 (and elsewhere nationally, on the motorway network or otherwise) experience the theft of goods, loads, fuel etc perpetrated by highly Organised Criminal Gangs who travel the country. In the light of paragraph 135(f) of the NPPF, the Local Plan could and should seek to encourage/deliver HGV parking at the AB2 location which minimizes such criminal opportunity.</p> <p>Park Mark Freight (managed by the British Parking Association) is a comparatively new and comprehensive assessment/accreditation scheme specifically for lorry parks and truck stops, developed in response to the rise in cargo theft in recent years and the Department for Transport's policies for improving roadside facilities for drivers.</p>
<b>Q7 Modification</b>	<p>It is recommended that Point 3 is amended as follows:</p> <p>"Provision for secure, high quality Heavy Goods Vehicle lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. The management and operation arrangements for the lorry park provision to be agreed with National Highways in consultation with Staffordshire County Council. To provide secure HGV lorry parking, the site should be designed and operate in accordance with Park Mark Freight scheme requirements and achieve Park Mark Freight accreditation."</p> <p>-----</p> <p>Under Supporting Information, the following is suggested:</p> <p>"Park Mark Freight (owned by the not-for-profit Police Crime Prevention Initiatives and managed on their behalf by the British Parking Association) is a comprehensive assessment/accreditation scheme specifically for lorry parks and truck stops, developed in response to the rise in cargo theft in recent years and the Department for Transport's policies for improving roadside facilities for drivers. Expectations for efficient, well managed and high quality lorry parks and truck stops are increasing the demand for services that are pleasant to use but secure enough to combat vehicle and cargo crime. Park Mark Freight informs current and potential customers of the highest standards in all aspects of the lorry parking or truck stop experience and enable operators and providers to show the value of their parking services."</p> <p>-----</p> <p>Under Related Documents</p> <p>Park Mark Freight - Police Crime Prevention Initiatives/British Parking Association</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP613
<b>Order</b>	260
<b>Title</b>	Appendix 3: Parking Standards
<b>Consultee Company / Organisation</b>	Staffordshire Police
<b>Consultee Family Name</b>	Elkington
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Table 12
<b>Q5 Legally compliant</b>	Yes

<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Table 12 of the Parking Standards (on page 185) includes a section relating to Pedal Cycles. It includes the following - "The most appropriate facility for cycle parking will be a 'Sheffield stand'. The siting of the stand should be in a location that is convenient, under cover and secure through natural observation (for example, at entrance to building. For residential developments, cycle sheds may be more appropriate). Location of pedal cycle parking facilities should be agreed in writing by the Local Planning Authority."</p> <p>Cycle theft is a significant local and national issue, which is likely to persist. In the light of paragraphs 96(b) and 135(f), the Local Plan could and should do more to encourage/deliver more secure forms of cycle storage and reduce criminal opportunity.</p>
<b>Q7 Modification</b>	<p>It recommended that the aforementioned extract is replaced as follows:</p> <p>"The most appropriate facility for cycle parking may well be a 'Sheffield stand'. The siting of the stand should be in a location that is convenient, under cover and subject to natural observation (for example, at entrance to building. For residential developments, cycle sheds may be more appropriate. However, for apartment blocks, an integral cycle store should be incorporated featuring suitably robust doorsets, access control and adequate lighting, which is an inherently more secure arrangement). For public cycle parking, attention is directed to the document Standards for Public Cycle Parking jointly published by the Bicycle Association, Sustrans and Secured by Design. Location of pedal cycle parking facilities should be agreed in writing by the Local Planning Authority."</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP611
<b>Order</b>	50
<b>Title</b>	Policy HOU5: Specialist Needs Housing
<b>Consultee Company / Organisation</b>	Staffordshire Police
<b>Consultee Family Name</b>	Elkington
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>HOU5 relates to Specialist Needs Housing. It opens with "Proposals for new care homes and specialist accommodation, including for older people ...". The focus of HOU5 appears to relate solely to older people, which seems remiss. It is suggested that the reference to 'care homes' could just as easily relate to care homes for children, although this is not reflected in HOU5.</p>
<b>Q7 Modification</b>	<p>Should care homes for children be specifically factored in to HOU5, it is recommended that the following comment is included:</p> <p>"Care homes for children will not be permitted where it can be demonstrated that despite the best efforts of those responsible for them, a concern has been identified that looked-after children, who may be vulnerable in general terms or have specific vulnerabilities based on their previous experience, could be exposed to a range of criminal and anti-social risks, including criminal or sexual exploitation and/or be drawn into such activity by connecting with those involved in such activities within the local area</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP879
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	Joane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>just can not see how this will work,with the parking situation at the moment with diglake street,, edward street and albert street. these streets are full in the evening and weekends with parked cars and passing other vehicles is awkward. it has been suggested that there is parking to be provided for the residents of diglake street/ edward street in the north/west corner of AB12 to esae parking, but just can't see how this will work. it will push move vehicles to park on to B5500 road. the junction of diglake street/B5500 and albert street/B5500 are dangerous to pull out of as visability is very restricted with the parking situation at the moment.</p> <p>i have attached 2 photos showing how busy the street of diglake street is.</p> <p>after going to the nulbc drop in and speaking to a couple of councilors they were unaware of the access point being via diglake street, and after speaking to councillor nickolas crisp who again was unaware of this being the access point, but he still agreed to the plan! advised that he would look in to this a little more. He arranged a phone call with my neighbour on the 28th september and he advised that even the planning officers think its strange that traffic will come up diglake street, they still put it in as they want to sell it with planning.</p> <p>staffordshire county council -the highways authority have already rasied concers with diglake street being the access point.</p> <p>the fields on AB12 are classed as strong greenbelt and at the moment are being rented to a local farmer who wishes to keep on renting the fields for future use.</p>
<b>Q7 Modification</b>	AB12 should be removed from the local plan.
<b>Q10 File 1</b>	6389358
<b>Q10 File 2</b>	6389359
<b>Attachments</b>	<a href="#">1364231 Joane Evans 1.png</a> <a href="#">1364231 Joane Evans 2.jpg</a>

<b>Comment ID</b>	NULLP451
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	RI
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider the proposal to build 125 houses on the site known as AB12 to be unsound for the following reasons:-</p> <p>1)The proposed site is currently Green Belt and good agricultural land that contributes to the well-being of the local population. It is able to absorb rain water and helps mitigate any adverse local climate change issues. The building of 125 houses and all the road infrastructure associated with such a development will have an adverse affect on flooding plus additional road traffic to an already congested area.</p> <p>2)Access to the proposed site is along Diglake Street and via a "track off Ravens Lane", neither of which are considered workable without causing disruption to the existing residents by banning them parking cars outside their own houses. This is not considered to be a right and fair way to encourage cooperation between neighbours.</p> <p>3)The proposed additional 125 houses will no doubt add to the vehicle count in the area and contribute to more congestion in an already busy area. The road through Bignall End is a 'rat run' for commuters traveling between Crewe/Audley into the Potteries as they try to avoid the congestion on the A500. I have witnessed major disruption to bus services at all times of the day due to vehicles parked on both sides restricting the width of the carriageway and I see the proposed site will only make the situation worse.</p> <p>4)The extra 125 houses would probably overstretch the existing Schools, Doctor and Dentist surgeries and car parks unless additional resources are put in place as a condition of the plan up front.</p>
<b>Q7 Modification</b>	The Planning Inspectorate should delete the proposed building of 125 houses in site AB12 as completely unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP993
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	RI
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider the proposal to build 55 houses on the site known as AB33 to be unsound for the following reasons:-</p> <p>1)The proposed site is currently Green Belt and good agricultural land that contributes to the well-being of the local population. It is able to absorb rain water and helps mitigate any adverse local climate change issues. The building of 80 houses and all the road infrastructure associated with such a development will have an adverse affect on flooding plus additional road traffic to an already congested area.</p> <p>2)The proposed additional 55 houses will no doubt add to the vehicle count in the area and contribute to more congestion in an already busy area. The road through Audley is a 'rat run' for commuters traveling between Crewe and the Potteries as they try to avoid the congestion on the A500. I have witnessed major congestion at all times of the day due to the vehicles trying to negotiate the mini roundabout on the B5500 Nantwich Road and I see the proposed site will only make the situation worse.</p> <p>3)The proposed access to the site is along Park Lane which is a single track road for most of its length used by agricultural tractors and associated heavy machinery making it very difficult to pass even another car without the need to reverse into a gateway or similar.</p> <p>4)Where Park Lane joins the B5500, it forms an offset crossroads with Chester Road so any increase in traffic at this junction would require traffic lights or a new roundabout to make the junction safe and fit for purpose.</p> <p>5)The extra 55 houses would definitely overstretch the existing Schools, Doctor and Dentist surgeries and car parks unless additional resources are put in place as a condition of the plan up front.</p>
<b>Q7 Modification</b>	The Planning Inspectorate should delete the proposed building of 55 houses in site AB33 as completely unsound.

<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP830
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	RI
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider the proposal to build 33 houses on the site known as AB15 to be unsound for the following reasons:-</p> <p>1)The proposed site is currently Green Belt and good agricultural land that contributes to the well-being of the local population. It is able to absorb rain water and helps mitigate any adverse local climate change issues. The building of 33 houses and all the road infrastructure associated with such a development will have an adverse affect on flooding plus additional road traffic to an already congested area.</p> <p>2)The proposed additional 33 houses will no doubt add to the vehicle count in the area and contribute to more congestion in an already busy area. The road through Audley is a 'rat run' for commuters traveling between Crewe and the Potteries as they try to avoid the congestion on the A500. I have witnessed major congestion at all times of the day due to the vehicles trying to negotiate the mini roundabout on the B5500 Nantwich Road and I see the proposed site will only make the situation worse.</p> <p>3)The extra 33 houses would probably overstretch the existing Schools, Doctor and Dentist surgeries and car parks unless additional resources are put in place as a condition of the plan up front.</p>
<b>Q7 Modification</b>	The Planning Inspectorate should delete the proposed building of 33 houses in site AB15 as completely unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1123
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	RI
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The policy AB2 proposes redevelopment of agricultural land to the South East of junction 16 of the M6 as an industrial site which I consider to be completely flawed for many reasons which I will outline below.</p> <p>1) Traffic congestion. The proposed development relies on its main access to be off the A500 to the East of the junction 16 on the M6. Whether this will involve another roundabout or traffic lights is not clear, but in the proposal it has been suggested that there is "no traffic problem in the area" which I strongly refute and can be prove otherwise.</p> <p>On the 23rd, 25th and 27th September, a group of local residents carried out a traffic count and survey of the A500 the results of which confirmed that there are major congestion hold ups on this road in the vicinity of junction 16. The first is West bound traffic builds up for over a mile before junction 16 between 07:00 and 08:45 each morning. The second hold up is where the A500 meets the A531/A5020 on a roundabout at Meremore Moss and again, its the westbound traffic that backs up towards junction 16 between 07:00 and 08:30. It should be noted that the A500 is only single carriageway here and was seen to carry over 1,500 vehicles per hour in each direction at peak periods. All these figures are available if proof is required.</p> <p>During the traffic count on Wednesday 25th, an accident on the M6 Northbound at around 17:00 meant that junction 16 virtually came to a standstill as did the traffic on the A500 in both directions so no meaningful results were measured but it was observed that two fire appliances trying to attend the accident were held up by the traffic stopped on the single carriageway and had to slowly force their way through down the centre of the road. The accident then resulted in traffic diverting along the B5500 as this is a well known (and used) way to divert around any problems at junction 16. On Friday 4th October, the A500 was closed in both directions from 22:00 until 11:00 the next day due to a fatal accident at the very site of this AB2 proposal resulting in traffic on the B5500 again.</p> <p>It has been noted that two "Emergency access points" have been suggested for AB2 using narrow single lane roads to the South of the site. There are difficult to traverse even in a car so use for Emergency vehicles in a hurry beggers belief. They are farm access roads used by tractors and associated heavy machinery and if you meet one, it is a question of finding the nearest gateway or grass verge to get out of the way, not a very sensible "Emergency" route.</p>

	<p>Requirement for AB2</p> <p>The NULBC state that this is a "strategic employment site serving the employment needs of the Borough and wider sub-region". They state that they require 22 hectares but the plan now shows a requirement for 80 hectares, that is 4 times as much as they said they needed originally so how is this justified? What they choose to ignore is the fact that there are several "strategic sites" in the area that have buildings empty and have so for the last few years. There is a major industrial development at Radway Green that is only 1.5miles as the crow flies from junction 16 that is desperate to find clients to take on their empty buildings so I cannot understand the logic of the Borough Council. This proposed site will sacrifice good agricultural farm land and replace it with tones of concrete and tarmacadam, how can that fit in with our Carbon reduction/ Climate Change policy. It would also increase the chances of local flooding and pollution from vehicle movements into the streams and waterways, add to noise and light pollution, contribute to air pollution and generally have a detrimental affect on the local population. I note that the report raised by the Urban Vision Enterprise on behalf of the Audley Parish Council raised many concerns about the lack of clarity and answers provided by the NULBC and even considered part of the consultation under Regulation 18 unlawful?? In conclusion, I see no positives whatsoever for this proposed AB2 site and hopefully, the planning inspectorate will see the folly of it all.</p>
<b>Q7 Modification</b>	I consider AB2 to be unsound and should not be considered as a viable prospect. It will cause significant damage to the environment and result in considerably more traffic congestion for the whole area.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	The information regarding traffic flow along the A500 given in the proposal are incorrect and misleading but I have actual traffic count figures taken at the end of September 2024

<b>Comment ID</b>	NULLP1275
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Cheshire East Council
<b>Consultee Position</b>	Strategic and Environmental Planning Manager
<b>Consultee Family Name</b>	Evans
<b>Consultee Given Name</b>	Tom
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Comments by Cheshire East Council on Newcastle-under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>Cheshire East Council objects to Policy AB2 which proposes to allocate a strategic employment site on "Land at Junction 16 of the M6" and is seeking to have this allocation removed from the Local Plan. The council considers that the evidence base presented does not support the allocation of this site. In addition, it is concerned that, whilst the site is located close to the boundary with Cheshire East, its implications for Crewe and the wider area within the south of Cheshire East area have not been sufficiently explored or understood.</p> <p>In particular, the council is concerned that there appears to be a misalignment between the housing and economic strategies of the draft plan, the consequences of which may not have been fully considered through the plan or its evidence base, and which could potentially have impacts on Cheshire East, for example in terms of commuting patterns, housing demand, and infrastructure requirements.</p> <p>The council's concerns are detailed below:</p> <p><b>Housing and economic needs</b></p> <p>The Housing and Economic Needs Assessment [ED001] uses a blended approach of economic forecasts, which suggests that the borough is capable of creating an average of +237 jobs per year and that the working age population of the borough would need to increase by +2% to support this level of job creation. To support the +2% increase in the working age population, 400 new homes per year would be required; and to enable +237 new jobs per year, a range of between 43.1ha and 83.0ha of employment land between 2023-2040 would be required (and this range includes a buffer of 12.5ha to allow for choice and flexibility).</p> <p>The overall strategy for development is set out in Policy PSD1: Overall Development Strategy. The plan strategy seeks to deliver a minimum of 8,000 homes over the plan period (2020-2040) and makes provision for a minimum of 63ha of employment land over the same period. These overall levels of development set out in the plan strategy (minimum 8,000 new homes and minimum 63ha employment land) seem to be supported by the evidence set out in the Housing and Economic Needs Assessment. Policy PSD1 also sets out that, to deliver these levels of development, the plan will make sufficient provision for housing, employment and other uses by supporting the development of sites allocated in the plan (including two strategic employment land sites) as well as through windfall development.</p> <p><b>Housing provision</b></p> <p>The Plan Strategy Housing Topic Paper [ED031] sets out (at Table 3) the sources of housing land supply, including proposed site allocations, the existing supply, and a windfall allowance. The total proposed housing supply amounts to 8,663 new homes, which provides a flexibility factor of 8.3% above the minimum 8,000 required under Policy PSD1.</p> <p><b>Economic provision</b></p> <p>The Plan Strategy Employment Topic Paper [ED032] sets out (at Table 3) the sources of employment land supply, including proposed site allocations, proposed strategic allocations, and (it is assumed but not clear from the table) the existing employment land supply. The total proposed employment land supply amounts to 104.6ha, which provides a flexibility factor of 66% above the minimum 63ha required under Policy PSD1.</p> <p>However, we question some of the figures set out in the proposed employment land supply. In particular, the figure of 22ha of employment land at site AB2 does not appear to reflect the reality of the proposed allocation. The policy for Site AB2 states that the site extends to circa 80 hectares and is allocated for uses including 22ha of employment land (220,000 sq.m of floorspace). The Strategic Employment Sites Assessment includes similar figures, and notes that the site is around 78ha and could accommodate approximately 2.35 million sq.ft employment accommodation (218,322 sq.m).</p> <p>A normal rule of thumb for industrial and warehousing development is to assume a 40% plot-floorspace ratio, and this 40% ratio is used in the Housing and Economic Needs Assessment to provide evidence for the minimum 63ha employment land in the plan strategy. Therefore, we question whether the 22ha identified for employment land could deliver 220,000 sq.m floorspace (a 100% plot-floorspace ratio) and note that the evidence does not appear to demonstrate that this is achievable. The plan does not appear to set out what is intended for the remaining 58ha of the site. Other than provision of lorry parking, the requirements of the site policy all seem to relate to the type of things that would normally be expected on a large employment site. Given the gross size of the site and the level of employment floorspace envisaged under the policy, it is not clear why only 22ha is included in the employment land supply and it does seem that the full site size of 80ha should be included instead.</p> <p>Site BW1 Chatterley Valley and Site CT20 Rowhurst Close contribute 6.5ha and 7.5ha respectively to the supply in the Plan Strategy Employment Topic Paper, but are proposed for allocation for 6.4ha and 8.88ha of employment land in the plan.</p>

Therefore, if using the full site size for Site AB2 (80ha) and the employment land figures set out in the plan itself for sites BW1 (7.4ha), and CT20 (8.88ha), the proposed employment land supply would amount to 163.88ha, which provides a flexibility factor of 160% above the minimum 63ha required under Policy PSD1.

#### Case for strategic employment sites

The Strategic Employment Sites Assessment [ED002] considers the market demand for life sciences and regional logistics development and much of the evidence base appears to promote a case for a large scale logistics development at Site AB2 (e.g. Strategic Employment Sites Assessment para 3.74), but the proposed site allocation is for general employment use and makes no mention of large scale logistics. The mix of employment uses set out in the site policy (employment will comprise offices, research and development, industrial processes, general industrial, storage and distribution and open storage) are exactly the same as the mix of employment uses set out for Site BW1 and Site CT20.

Consequently, it is unclear why the evidence base advances the case for a regional logistics development, but the proposed allocation is for general employment use.

The Housing and Economic Needs Assessment (Chapter 7) also promotes some reasoning for including strategic employment sites, including:

- Strategic sites are unlikely to increase to number of jobs above the baseline (+237 per year) level;
- Some jobs on strategic sites are already included in the baseline;
- There is a long timeline for developing strategic sites; and
- The use of a wider labour market.

If strategic sites are unlikely to increase the number of jobs above the baseline level (+237 per year), then it is not clear why such a large supply of employment land is needed, when the evidence base shows that a minimum of 63ha is needed to deliver this level of jobs growth. Furthermore, the Strategic Transport Assessment [ED011] considers that the proposed strategic employment sites may enable the delivery of 4,578 jobs during the plan period. These new jobs on the strategic sites alone could therefore average 229 per year over the 20 year plan period, so would clearly enable an increase in jobs above the baseline (+237 per year) level across the whole borough.

Whilst large sites may take longer to develop than smaller ones, we understand that they are capable of being developed in full during the plan period, creating the number of jobs envisaged. The argument around the use of a wider labour market effectively says that the sites would be dependent on a high level of in-commuting.

#### Link between the housing and economic strategies

As set out in the plan strategy (and supported by the evidence), the creation of +237 jobs per year requires a minimum of 63ha employment land and an increase in the working age population of 2%, which in turn requires 400 new homes per year.

The level of housing provision (8,663 new homes) is in line with the plan strategy of a minimum of 8,000, with a flexibility factor of 8.3%. However, the level of employment land provision (163.88 ha) appears to be excessive to deliver the plan strategy, giving a flexibility factor of +160% above the plan strategy requirement of a minimum of 63ha.

It is not clear why such an excessive amount of employment land is required to deliver the plan strategy of +237 jobs per year, and it appears that the proposed level of employment land provision would enable significantly in excess of +237 jobs per year to be created. If the plan seeks to increase the number of jobs above the baseline (+237), then this increased number of jobs should be quantified, and considered through the evidence base to inform the required increase in working age population, the resulting number of new homes needed, and any resulting infrastructure requirements. This updated evidence on the number of homes and infrastructure requirements should then be reflected in the plan strategy.

Our comments concerning the case for the strategic employment sites and its link to the housing strategy (as detailed above), raises serious questions about whether the exceptional circumstances needed to remove Site AB2 from the Green Belt have been justified.

#### Site AB2 – Site Specific Matters

In the event that the Inspector is minded to retain this site, the Council makes the following comments around how the policy should be modified.

Notwithstanding the concerns over the overall amount of employment land provision, the site policy for AB2 only requires the Travel Plan to “consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East”.

Given the existing lack of access by sustainable transport modes, it is considered that the site policy should include a much stronger policy hook such as “Funding towards (or direct provision of) public transport (including demand responsive) should be agreed between the Local Transport Authorities of Cheshire East and Staffordshire County Council to minimise the number of private vehicle trips to the development”. This funding also needs to be sustainable into the longer term.

The traffic modelling undertaken so far is strategic in nature, although we are aware that National Highways have been involved in a more detailed review which is appropriate given the potential impacts on the motorway slip roads. Cheshire East Council is keen to understand what the impacts would be on the A500 in Cheshire East, and the policy should also require that mitigation measures also need to be agreed with Cheshire East Council.

The site is close to the Barthomley Conservation Area, which includes a number of listed buildings both within the area and its immediate vicinity. The council notes both that the policy requires an HIA to be undertaken and that the supporting information refers to the need to assess the effects on landscape and visual receptors in Cheshire East at the planning application stage. The council considers that there is scope for this assessment over the wider area to be included as a requirement in the policy itself. This could also include the need for a site development brief to be developed and consulted upon which will detail how wider impacts can be minimised.

#### Impacts on Cheshire East

Without the evidence that the level of housing proposed is broadly in line with the level of jobs that could be created, it is not clear where the additional jobholders would live and it is not clear that the plan proposals would promote sustainable patterns of development.

In particular, Site AB2 is adjacent to the borough boundary and is slightly closer to the centre of Crewe than it is to the centre of Newcastle-under-Lyme (and much closer to the centre of Alsager). There are



	<p>concerns over the impacts that the plan may have on Cheshire East, for example in terms of housing demand, infrastructure requirements and travel patterns.</p>
<b>Q7 Modification</b>	<p>Cheshire East Council objects to Policy AB2 which proposes to allocate a strategic employment site on "Land at Junction 16 of the M6" and is seeking to have this allocation removed from the Local Plan.</p> <p>In the event that the Inspector is minded to retain this site, the Council makes the following comments around how the policy should be modified.</p> <p>Notwithstanding the concerns over the overall amount of employment land provision, the site policy for AB2 only requires the Travel Plan to "consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East".</p> <p>Given the existing lack of access by sustainable transport modes, it is considered that the site policy should include a much stronger policy hook such as "Funding towards (or direct provision of) public transport (including demand responsive) should be agreed between the Local Transport Authorities of Cheshire East and Staffordshire County Council to minimise the number of private vehicle trips to the development". This funding also needs to be sustainable into the longer term.</p> <p>The traffic modelling undertaken so far is strategic in nature, although we are aware that National Highways have been involved in a more detailed review which is appropriate given the potential impacts on the motorway slip roads. Cheshire East Council is keen to understand what the impacts would be on the A500 in Cheshire East, and the policy should also require that mitigation measures also need to be agreed with Cheshire East Council.</p> <p>The site is close to the Barthomley Conservation Area, which includes a number of listed buildings both within the area and its immediate vicinity. The council notes both that the policy requires an HIA to be undertaken and that the supporting information refers to the need to assess the effects on landscape and visual receptors in Cheshire East at the planning application stage. The council considers that there is scope for this assessment over the wider area to be included as a requirement in the policy itself. This could also include the need for a site development brief to be developed and consulted upon which will detail how wider impacts can be minimised.</p> <p>Impacts on Cheshire East</p> <p>Without the evidence that the level of housing proposed is broadly in line with the level of jobs that could be created, it is not clear where the additional jobholders would live and it is not clear that the plan proposals would promote sustainable patterns of development.</p> <p>In particular, Site AB2 is adjacent to the borough boundary and is slightly closer to the centre of Crewe than it is to the centre of Newcastle-under-Lyme (and much closer to the centre of Alsager). There are concerns over the impacts that the plan may have on Cheshire East, for example in terms of housing demand, infrastructure requirements and travel patterns.</p>

<b>Comment ID</b>	NULLP1417
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Everall
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1364
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Everall
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in</p>

	<p>our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1492
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Faint
<b>Consultee Given Name</b>	Gemma
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. 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Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <ul style="list-style-type: none"> <li>• Not enough schools in the area.</li> <li>• GP's are already overcrowded</li> <li>• Dentists unable to take on new patients</li> <li>• Red Street as a village cannot cope with the volume of traffic we have today let alone more houses with cars</li> <li>• St Chad's School has 6 classes already in porta cabins</li> </ul>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1491
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Faint
<b>Consultee Given Name</b>	Gemma
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in</p>



	<p>our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1451
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Faint
<b>Consultee Given Name</b>	Stephen
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1452
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Faint
<b>Consultee Given Name</b>	Stephen
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed</p>

leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of

	<p>the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP980
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Farrington
<b>Consultee Given Name</b>	Johanna
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Newcastle Council claims that the borough is short of 22Ha of employment land, based on a 'high growth scenario'. However, they are withdrawing 80Ha of land from the green-belt to achieve this goal. The Site can accommodate 61.76Ha of employment land - far more than they say they need - and 18.24Ha of non-employment land. Although, the developers have noted that they will only actually require 1.88Ha for the lorry park and 3.6Ha proposed strategic open space. This means that the site will lead to an imbalanced local plan with 39.76Ha of employment land in excess of that needed, and therefore cannot be justified and is hence unsound.</p> <p>The site will generate huge amounts of traffic, including large delivery vehicles, employee's vehicles, and service vehicles, which could be 24hrs a day. There are already high levels of traffic at Junction 16 of the M6 and on the A500 and this is likely to increase as a result of the Proposed Development. It may also result in increased amounts of traffic using local village routes to avoid queues and congestion on the main roads. The site is far from public transport, which means most staff will need to travel by car. In view of this, this part of the plan is unsound.</p> <p>My understanding is that, at the present time, the council do not have a proposed buyer or occupant for the proposed warehousing and therefore the council's 'high growth scenario' may not be deliverable and is not justified. It is therefore unsound.</p> <p>Unemployment rates in the local area are very low. The Newcastle Council have identified that there are about 9 million people within one hour's journey of the site. However, employees traveling such a distance to work will undoubtedly cause even more increased traffic, or alternatively put more pressure on the local housing market. In this respect it is not justified and is therefore unsound.</p>
<b>Q7 Modification</b>	To render the Local Plan sound, remove the plan for AB2 from the Local Plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	N/A

<b>Comment ID</b>	NULLP1010
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Fenton
<b>Consultee Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	NC13
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b><u>Site selection / Plan not Justified/Positively Prepared</u></b></p> <p>The selection of Green Belt sites has not been transparent. Sites have been selected and removed from the plan with no explanation other than they were identified during a call for sites.</p> <p>(redacted by admin) I believe NC13 was put forward by a neighbouring Residents group to divert attention away from a site originally identified in their area.</p> <p>More senior Councillors and Council Officers have also ensured no sites have been proposed where they live. The whole selection process is suspect and if the plan goes ahead it needs to be subjected to independent scrutiny.</p> <p>The Council have also not provided any evidence that all Brownfield land in the Borough has been exhausted before it started identifying Greenbelt land. There are several derelict farm sites in our area that could have been investigated but haven't</p> <p><b><u>New National Planning Policy Framework / Plan not consistent with National Policy</u></b></p> <p>This plan has been rushed through in an attempt to get it approved before the NPPF rule changes are implemented. This was witnessed at Full Council on 24/7/24 when all Conservative Councillors were ordered to vote in favour of the plan without having time to read all the evidence documents some that had only been released that week.</p> <p>What is the point of approving a plan that will be out of date and not compliant with Government Policy before it has even started. The Council know that the Greenbelt sites will not be as profitable if they have to comply with imminent new NPPF rules. For example, the increase to 50% affordable housing required on redesignated Greenbelt land.</p> <p><b><u>Plan not legally compliant Consultation/ Insufficient publicity and confusing processes</u></b></p> <p>I was completely unaware of the first period of consultation in 2021 and the only reason I became aware of the second period in 2023 was a neighbour photographed an A4 paper notice attached to the gate of NC13 before it got wet and blew away in a few days. Had I not seen this Facebook post my family and I would not be aware to date of the Local Plan's potential impact on our community.</p> <p>All residents living adjacent to proposed sites should have been notified by letter.</p> <p>The Planning Portal was very difficult to navigate and submit comments and was overwhelming and near impossible for those who are not I.T. confident. A lot of my neighbours gave up trying. I personally submitted comments on the portal and by email and not one appeared on the Portal 'what people say' results section.</p> <p>The removal of the Greenbelt protection on NC13 is a huge decision and there is no evidence of any investigation being done into community concerns raised during the consultation for example traffic / school parking surveys. All roads in and out of NC13 will be through already congested residential areas that's 100 to 200 extra cars on tired, poorly maintained roads with no employment existing or planned within a several miles. It makes no sense and those who took the trouble to take part in the consultation have been ignored by a tick box meaningless consultation process.</p>
<b>Q7 Modification</b>	<p>Full disclosure of the site selection processes specific to individual sites</p> <p>Delay and Redraft of plan to fit new NPPF</p> <p>Proper responses and action to respond to effectively to public consultation.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP438
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Finch
<b>Consultee Given Name</b>	Ashley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Hi i live at (redacted by admin) and im really concerned about one plot of new housing planned in particular. The plot of 100 new homes at location SP11(4). This is bad for the area:</p> <p>Firstly, its a local kids park (they dont have anywhere to play and stay out of trouble as it is) my daughter uses the one area locally to get fresh air and be outside, we walk up to the woods from there aswell, again being out in nature and not stuck inside. Its vital for a healthy mind.</p> <p>Secondly, the racecourse road itself isnt fit for purpose as it is, the current traffic struggles to get down the street. Especially during school traffic times of the day. The access for the planned extra 100 homes plot being at the top will cause chaos for the local homes including mine. We are already struggling at times to get on and off our driveways. The roads too narrow and when parked cars are on the street its easily blocked by traffic and any larger vehicle.</p> <p>I understand people need homes. And fully understand the other plots proposed for the area, even though i dont agree with it being built on green land / woodland.</p> <p>Please reconsider the sp11(4) plot as it is going have a really negative impact on the local community and my family. Who already are suffering the disaster that is the ongoing landfill problems.</p>

<b>Comment ID</b>	NULLP1446
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Findler
<b>Consultee Given Name</b>	Carol
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1388
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Findler
<b>Consultee Given Name</b>	Carol
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2

<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP660
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Finney
<b>Consultee Given Name</b>	Deborah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Please see below my response to the proposed building on the old keele golf course :</p> <ul style="list-style-type: none"> <li>- I am concerned about the effects on drainage building on the old golf course will have on those of us living on Ashbourne drive and further down in the village. We already have springs popping up all over the place and flooding despite the land up there being like a huge sponge, it will not be able to soak up any water when it is covered in tarmac.</li> <li>- there are no plans for a gp surgery or any schools despite the number of houses proposed. Since heritage park was built the schools are full and you cannot get a gp appointment. The traffic in the village and the state of our roads is awful. This will be made way worse with the proposed extra homes.</li> <li>- the proposed entry points for the new estates cannot be allowed to happen. The racecourse is already dangerous with the number of parked cars especially at school pick up and drop off time. If this is the only entry point for the proposed park road build it will become even more treacherous and way too busy, every car in and out of the new estate will be passing a school full of young children.</li> <li>- the other entry point for the build behind the cricket club will be dreadful for Ashbourne drive. It will turn our street into a rat run onto the new estate and will ruin the lovely quiet little close at the top of Ashbourne drive. The road does not have the capacity for that amount of traffic it is a crazy idea. Why are these new estates not being accessed off the Keele bypass and cemetery road rather than sending traffic via populated streets? It is a very dangerous proposal for the inhabitants and our children due to the increased traffic.</li> <li>- the old golf course is used by all the residents for walking etc it a beautiful green space which was a godsend during Covid, full of wildlife and it's an absolute travesty that you are even thinking of building on it.</li> </ul> <p>I feel the build on this lovely area is a done deal and none of our opinions are going to make any difference to the final decision but I really do hope that the dangers of the proposed access points are re thought and redirected via keele and cemetery road for the safety of the inhabitants of Silverdale.</p>

<b>Comment ID</b>	NULLP593
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Flanagan
<b>Consultee Given Name</b>	Amanda
<b>Q6 Details</b>	<p>Regulation 19 Publication – Not Compliant with Duty to Co-operate</p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Comment ID</b>	NULLP592
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Flanagan
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p>Local Draft Plan</p> <p>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</p> <p>Green Belt - Unsound</p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p>



Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawksetc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

**Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

**Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

**Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing aNHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions thathave had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead

#### Q7 Modification

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally,

the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.

<b>Comment ID</b>	NULLP890
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Draft Policy HOU1 Affordable Housing</p> <p>As part of preparing additional guidance to inform detailed delivery of this policy, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> <li>•Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.</li> <li>•Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).</li> <li>•Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</li> </ul>
<b>Q10 File 1</b>	6389360
<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>
<b>Comment ID</b>	NULLP894
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Draft Policy HOU1 Affordable Housing</p> <p>As part of preparing additional guidance to inform detailed delivery of this policy, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> <li>•Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners.</li> <li>•Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies).</li> <li>•Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.</li> </ul>
<b>Q10 File 1</b>	6389360

<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>
<b>Comment ID</b>	NULLP888
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Draft Policy CRE1 Climate Change</p> <p>Draft Policy CRE1 seeks to promote both climate mitigation and adaptation strategies to new development. The NHS requires all new development projects to be net zero carbon, and NHSPS fully support policies that promote carbon neutral development. In considering the implementation of policies related to net zero, we would highlight that if ever introduced, NHS property could benefit from carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.</p>
<b>Q10 File 1</b>	6389360
<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>
<b>Comment ID</b>	NULLP892
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p>Draft Policy IN1 Infrastructure</p> <p>Draft Policy IN1 states that all new development will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal.</p> <p>We request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the IDP, prior to submission. Further comments on IDP are provided in the relevant section below. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new developments create a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be clarified that the NHS and its partners will need to work with the council in the formulation of appropriate mitigation measures.</p>
<b>Q10 File 1</b>	6389360
<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a> <a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>
<b>Comment ID</b>	NULLP885
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6

<b>Q6 Details</b>	<p>Draft Policy PSD6 Health and Wellbeing</p> <p>Draft Policy PSD6 sets out the Council's commitment to making sure that development promotes healthier lifestyles and improves overall health and wellbeing. NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessments on major developments. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p>
<b>Q10 File 1</b>	6389360
<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>
<b>Comment ID</b>	NULLP893
<b>Order</b>	94
<b>Title</b>	Policy IN5 Provision of Community Facilities
<b>Consultee Company / Organisation</b>	NHS Property Services
<b>Consultee Family Name</b>	Fleet
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN5
<b>Q6 Details</b>	<p>Draft Policy IN5 Provision of Community Facilities</p> <p>Draft Policy IN5 focuses on both the provision and protection of Community Facilities such as Health Centres. NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form. Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.</p> <p>The NHS requires flexibility with regards to the use of its estate to deliver its core objective of enabling excellent patient care and support key healthcare strategies such as the NHS Long Term Plan. In particular, the disposal of sites and properties which are redundant or no longer suitable for healthcare for best value (open market value) is a critical component in helping to fund new or improved services within a local area. Requiring NHS disposal sites to explore the potential for alternative community uses and/or to retain a substantial proportion of community facility provision adds unjustified delay to vital reinvestment in facilities and services for the community.</p> <p>All NHS land disposals must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. The decision about whether a property is surplus to NHS requirements is made by local health commissioners and NHS England. Sites can only be disposed of once the operational health requirement has ceased. This does not mean that the healthcare services are no longer needed in the area, rather it means that there are alternative provisions that are being invested in to modernise services.</p> <p>Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information. To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification (shown in red italics) to Draft Policy IN5.</p>
<b>Q7 Modification</b>	<p>Proposed Modification to Draft Policy IN5:</p> <p>1.</p> <p>Areas defined on the Policies Map, or land and buildings currently used or last used for community facilities, will be retained or serve as locations for development for such purposes. Development resulting in the loss of an existing community facility, or land allocated for such purpose, will be assessed on merit and only be permitted where:</p> <p>A.the buildings or land are no longer fit for the purpose which they were being used due to size, layout, design and condition and that no alternative community use can be found; orB.</p> <p>there is no longer a need or demand for the facility as evidenced by it being formally declared surplus to the operational requirements of the provider such as the NHS or identified as surplus as part of a published estates strategy or service transformation plan, or it's no longer viable; or</p> <p>C.where there is recognised need, alternative provision can be made on another site to the same or higher standard in terms of quantity, quality and community benefit; or</p> <p>D.the current use will be retained and enhanced by the development of a small portion of the development site</p>
<b>Q10 File 1</b>	6389360
<b>Q10 File 2</b>	6389361
<b>Attachments</b>	<a href="#">Newcastle-under-Lyme Reg 19 Response - October 2024.pdf</a>

<b>Comment ID</b>	NULLP1249
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Ford
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>Policy AB2 'Land at Junction 16 of the M6'</b></p> <p>The site extends to circa 80 hectares and is allocated for uses including 22 hectares (circa 220,000 sqm of floorspace) of employment land. Removing 80 ha of land from the green belt for 22 ha of employment land cannot be justified.</p> <p>There are alternative sites within the Borough and surrounding area as can be evidenced from the table below which was produced late September 2024. All of these units are within a 10 mile radius of Audley. We are aware Chatterley Valley has been incorporated into the employment land provision but Radway Green should be seriously considered as a viable alternative to AB2.</p> <p><i>(table available in attachment)</i></p> <p><b>2. Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 with emergency access via Barthomley Road, both to be delivered in Phase 1 of the development.</b> The developer St. Modwen Developments Limited, produced a report in January 2022 on 'Comments on Strategic Employment Land /issues' to Newcastle Under Lyme Council and employed the services of PJA based in Birmingham for their professional analysis. We have extracted comments which are relevant to the potential emergency access issues. 2.3.2 Park Lane and Moat Lane at the southern boundary of the site are minor rural lanes listed as advisory cycle routes in SCC's cycle maps. As indicated in Figure 2.2 the advisory routes continue to the east through Audley and Bignall End and to the west through Barthomley.</p> <p>3.4.1 In addition to the vehicular access from A16 J16, <b>two emergency vehicle access points would be provided from Park Lane and Moat Lane on the eastern and southern boundaries of the site respectively. Whilst these are not required from a policy or operational point of view, it is considered prudent to retain alternative temporary access arrangement</b>, in the unlikely event that the primary access be wholly blocked and an emergency occurs on site, which necessitates access for the emergency services.</p> <p>6.1.5 Park Lane/Moat Lane - A 'quiet lane' treatment, offering improved surfacing and signage to encourage cycle usage along a very lightly trafficked route.</p> <p><b>Please Note:</b> At some point between this report being submitted and the final draft Local Plan the emergency access route has been changed from <b>Moat Lane to Barthomley Road</b> without any explanation.</p> <p>The issues of concern to us with this emergency access are that:</p> <ol style="list-style-type: none"> <li>1. Given the highlighted section above as provided to NUL by St Modwen's the emergency accesses are not required from a policy or operational point of view yet it seems that two are still required.</li> <li>2. All local roads leading to the access are minor/quiet rural lanes listed as advisory cycle routes, they also are used recreationally for horse riding, dog walking, and both Audley Striders Walking and Running Club use these lanes regularly.</li> <li>3. Barthomley Road emergency access is to be developed in Phase 1, this leads to really worrying concerns as the main access to AB2 from the A500 will take a considerable length of time to build, yet the local access will not require the same level of development so it will become the likely first access into the site. Will this mean that all the heavy machinery will be using this access as it will seem incredible if the developer waits until the main access is available and lose precious time and money in the process.</li> <li>4. How is the access going to be managed so it is not misused? There has not been anything documented as to how it will be implemented. Any delays or blockages on the A500 could send vehicles to use this access as an alternative route.</li> <li>5. The lanes are single track with a few passing places and there are some blind bends. Locals on Barthomley Road have limited access to their driveways and visibility is poor for some of them.</li> </ol> <p><i>(Diagram available in attachment)</i></p> <p><b>3. Provision for secure, high quality Heavy Goods Vehicle lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. The management and operation arrangements for the lorry park provision to be agreed with National Highways in consultation with Staffordshire County Council</b></p> <p><b>13.13 The allocation of the site would result in a loss of a lay-by by the A500. Consequently, secure and high-quality HGV parking should be provided as a replacement on the site. This should include an element of free short stay parking for all HGV vehicles agreed following appropriate engagement with Staffordshire County Council and National Highways.</b></p> <p><u>Newcastle-under-Lyme Strategic Employment Site Assessment Report (2024) Evidence Base</u></p> <p><u>4 Review of Local Plan 2020 - 2040 Public Consultation</u></p> <p>4.16 This includes a 200-space lorry park to take vehicles off the A500. This is supported by the Road Haulage Association. Currently the A500 has the capacity in its lay-bys to cater for approximately 20 HGV lorries. If the lorry park goes ahead then this will increase the flow of HGV's ten fold and the only thing it will have achieved is to create an extra traffic lane where the lay-by once stood and encourage lots more lorries</p>



to come to Audley via the A500. This will have a knock-on effect of increasing air pollution, noise pollution and adding more traffic to an already very busy road. There are two service stations either side of Junction 16 in a North and South direction. Keele is less than 9 miles away and Sandbach is 8 miles away Both have free short stay parking for HGV vehicles.

**13. Implementation of an agreed comprehensive travel plan incorporating measures to support travel to / from the development, particularly by sustainable modes. This should implement initiatives to support sustainable travel into the site, to include cycle links into the development with suitable cycle parking / amenities, bus routes and demand responsive travel schemes to support workers travelling to / from the site. The Travel Plan should consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East**

Supporting Information

**13.14 A comprehensive travel plan will be required for the site. The travel plan should consider bus / demand services on the site to cater for shift patterns. The travel plan should establish targets, linked to the outcomes of a transport assessment and monitored via traffic counts and surveys. The travel plan should also consider initiatives including charging for car parking on site to fund, through revenue raised, bus services in the medium to longer term.**

. **Extracts from the Strategic Transport Assessment:** 4.6 Site AB2 is located on a dual carriageway with currently no footpath or nearby bus stop, therefore, no public transport was accessible within the catchment times. It should be noted that the developer has indicated that, following conversations with local bus operators and Staffordshire County Council, the development of this site would include a funded bus route to improve the public transport provision to the area and the site.

4.6.2 Site AB2 has poor accessibility scores for both walking and cycling.

**Extract from Newcastle-under-Lyme Borough Issues and Strategic Options Paper (2021):**

Issues:

- . The workforce is not within immediate proximity, and the site is removed from current public transport routes and local service centres, which could necessitate the creation of Sustainable Travel Plans.
- . The loss or potential moving of a lay-by to enable access to the site could be problematic indicating potential issues with site access and traffic flow.
- . An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area.
- . The site's strategic location on the M6 provides good accessibility to a large proportion of the UK's population and key markets, but this also means that the impact on the transport network needs careful consideration.

#### 8.6.1.1 Model Identified Mitigations

The final selection of mitigation measures is as follows, . AB2 - Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour.

#### 9.1 Summary

Accessibility Data Analysis

- . All strategic sites show an accessibility extent that is focussed towards The Potteries
- . MG Junction 16 site has poor public transport connectivity

Existing traffic conditions on the strategic road network: . M16 J16 - Observed data shows traffic congestion along the 4500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM),

#### **Newcastle-under-Lyme Strategic Employment Site Assessment Report (2023) Evidence Base**

2. Land at J16 of the M6 (ref: AB2): There is a lack of public transport serving the site, which could limit access for employees without private vehicles. Amenities and Workforce: The site's location, while excellent for logistics due to proximity to the M6, may lack local amenities and have issues related to the availability of local workforce. Mitigation Measures: The developer, St Modwen Developments, is working on mitigation measures for the identified transport issues, including improving access to the business park.

#### **Appendix B - Steering Group Minutes**

**Subject of meeting: Newcastle-under-Lyme Local Plan - Strategic Transport Assessment**

AB2: ' PG: Concerned about baseline public transport access . PT Agreed. Needs access by sustainable means. . PG: **Where developers agree to fund an enhanced bus service, there is a risk of it being discontinued once the funding period concludes leaving a site with no public transport access . JK: Mitigation is needed for J16 sites. We need to understand how the buses will operate outside of working hours. Operators need to be willing to run those and understand what they are going to do with the vehicles for the rest of the day.**

To summarise it is clear access issues are the prevalent theme given the location in such close proximity to the M6 and the potential to cause traffic delays at Junction 16 and the A500. Lack of public transport and other means of accessing the site apart from vehicles. It has been reported that AB2 could create up to 3000 jobs, although the figure has not been substantiated. Given that only buses could provide a public service to the site (no nearby rail station), would they invest in creating a new bus route until a demand has been identified? What about shift workers, would they provide a night time service? Would employees be happy to pay car parking charges at their place of work so the bus provision can be subsidised which has been suggested and noted in this report? What about the points raised above at the Steering Group meeting highlighted in bold.

Another issue has to be the increase in traffic if AB2 is built. Currently the local "Protect Audley Parish Greenbelt" group are carrying out traffic surveys on the A500 and roads leading into the village as during peak times u/e see a massive increase in road users. These figures will be made available in their submission to the Planning Inspector but we know from being local how busy the roads are even though they are 'B' roads. With the impending building of new housing in Audley as well the village will not be

able to cope. The infrastructure is already at breaking point with schools, dentists, doctors etc and there has been no mitigation for improvement that we are aware of in Audley. Audley a/so has a higher rate than the national average of breathing ailments and the increase in air pollution from CO2 and tyre particulate pollution as well as noise pollution.

#### **IN CONCLUSION**

- There are other alternative sites to AB2 as listed in the chart on Pg 1 that could be considered as alternative employment land for 'Big Box' developments within a 10 mile radius of Audley.
  - A huge lorry park will only increase HGV's on the A500, that is without consideration for the vehicles that will be employed by AB2. The A500 at Audley is already a very busy network with regular hold-ups leading up to the motorway, not only at peak times.
  - The access to the site from the A500 will be a huge undertaking and disrupt traffic flows whilst under construction. It will likely impact the slip road off J16 on the MG and the roundabout.
  - Increase in vehicles in the area can only have a detrimental affect on people living in Audley, both for ease of access into the village and air and noise pollution and will certainly increase the carbon footprint.
  - Emergency accesses from Park Lane and Barthomley Road are likely to be used in the event of blockages on the A500. They might also be used by contractors to start work on the site with heavy machinery as there is every likelihood the A500 entrance will take a long time to complete. These are quiet country single track lanes not designed for large vehicles or an increase in traffic. Local people on Barthomley Road already have access issues. A recent planning application 'A824' for new housing on Barthomley Road was rejected because "Barthomley Road is a single lane and could present access issues to the southern dwellings". These lanes are used by local people for recreational purposes.
  - Accessibility to the site is poor in terms of public transport, cycling or walking.
  - Removing agricultural land and green spaces which cannot be returned will affect the wildlife, will increase our carbon footprint, will be a blight on the countryside. There are in the areas surrounding AB2 a massive amount of industrial units and warehouses, one former local MP was quoted as saying he did not want his area to become known as 'the capital of warehouses'. They can be seen all around from any high ground like the Wedgewood Monument, or Apedale Country Park, JCB has a big presence too. We understand the need for employment land but there are plenty out there lying empty and unused
- PLEASE REMOVE AB2 FROM THE LOCAL PLAN AS IT IS NOT SOUND**

<b>Q7 Modification</b>	<b>PLEASE REMOVE AB2 FROM THE LOCAL PLAN AS IT IS NOT SOUND</b>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6391214
<b>Q10 File 2</b>	6391331
<b>Attachments</b>	<a href="#">1339680 Linda Ford 1.png</a> <a href="#">1339680 Linda Ford 2 .png</a>

<b>Comment ID</b>	NULLP346
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Foss
<b>Consultee Given Name</b>	Deborah
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>It is unclear how previous comments from Audley residents and representations made by Audley Parish Council on Site AB2 were taken into account, or whether they were taken into account as this has not been addressed or fully explained. I strongly object to the proposed allocation of Site AB2/AB2A (A500/M6).</p> <p>The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the site(s) from the process (Table 17, page 28). This issue was also considered in the Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, which found a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land. These recent reports appear to have been ignored. hence regulation 18 consultation not being lawful.</p> <p>Removal of the site(s) from the green belt would undermine the purposes for green belts set out in the NPPF, in particular by allowing major incursion and encroachment into the countryside and undermining of regeneration of the urban conurbation, by developing greenfield land in the countryside. The economic impact on the conurbation would be negative, due to:</p> <ul style="list-style-type: none"> <li>• the remoteness of the site(s);</li> <li>• the impact on the viability of alternative urban sites in the conurbation.</li> <li>• Harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to land used for growing food and agricultural employment.</li> </ul> <p>The traffic impacts would be negative, including:</p> <ul style="list-style-type: none"> <li>• Generation of road-based traffic and lack of sustainable transport alternatives;</li> <li>• Traffic impacts on the rural character of the area;</li> <li>• Impacts on the amenity and safety of rural roads and lanes.</li> </ul> <p>The development of this site would be unsustainable and environmentally harmful, due to:</p> <ul style="list-style-type: none"> <li>• biodiversity impacts on rural lanes, where they need to be widened, including destruction of adjoining landscapes;</li> <li>• development of greenfield land in an unsustainable location, remote from the existing urban conurbation;</li> <li>• a range of significant adverse impacts (visual, noise, light, disturbance, air quality).</li> </ul> <p>The development would introduce a major urban employment site within a rural parish, near to small rural villages and remote from local services.</p> <p>The Strategic Employment Site Assessment - 2024 Update (Aspinall Verdi) has failed to deal with the previously highlighted contradiction with the ARUP and UVE green belt assessment reports.</p> <p>The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...". The Table on page N37 identifies that site AB2 would have major negative impacts on: 'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.</p> <p>I note that positive impacts are identified for 'Climate Change' and 'Economy'. I believe that this finding is perverse. It is difficult to see how the development of a remote site, well outside of the urban conurbation, involving the loss of agricultural land and relying on road-based travel could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation has not been taken into account.</p> <p>Site variation AB2A is not mentioned so presumably this site has not been assessed. Tables N10 and N11 set out growth strategy options. Option 6D does not include site AB2 and delivers better scores/outcomes. The Newcastle-under-Lyme Landscape &amp; Visual Appraisal dated March 2023 identifies the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development. The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identifies ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network.</p> <p>The Strategic Housing &amp; Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable &amp; Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big</p>

inconsistency between Newcastle Under Lyme Borough Council's position in September 2022 and the present position in that a site identified as not deliverable or developable is now suggested for allocation, a complete contradiction.

Allocation of this site is not justified by the Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere. Development of AB2 would be harmful to the local economy, community and environment.

The site assessment is not supported by evidence and assessments. The site has been deleted from updates of some assessments. Allocation of the site conflicts with several of the proposed policies of the Local Plan.

Housing site allocations AB12, AB15 and AB33 are all within Audley Parish. The sites are close to existing settlements and do not create coalescence between settlements. Green belt release should only occur in exceptional circumstances.

The targets for new housing in the borough and in the Audley Parish are unnecessarily high and will involve the destruction of valuable greenbelt and serve to further undermine the weaker housing markets in the Borough, Stoke-on-Trent and Crewe. Despite the completion of 2,240 dwellings between 2011/12 and 2020/21, the population actually decreased (from 123,871 to 123,300) and the number of households grew by only 849. Government data on empty homes indicates that there were 1,688 empty homes in the Borough in October 2023. The 2021 census indicates that there were 53,423 households in 2021, whereas council tax records indicate that there were 57,627 dwellings. The planned level of growth will simply accelerate problems of urban decay, especially in Stoke-on-Trent. There is no economic or social case for the numbers involved.

Audley should be classed as a 'Local Centre' rather than a 'District Centre' as in previous versions of the Plan.

The Local Plan is fundamentally flawed. Allocation of site AB2/AB2A is in contradiction to the Local Plan's own evidence base and emerging policies and also inconsistent with national policy and guidance. It would cause substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire conurbation. There is a lack of consistency with national policy.

<b>Comment ID</b>	NULLP1220
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Foster
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a    These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p> <p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another'</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p>

The Proforma for CT1A also states that *“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”* In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability.



However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:**

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.

**Additional Comments:**

**Coal Mining**

The site was identified as a Coal Authority high risk area. This suggests that there is a high probability of ground movement. The old properties adjacent to CT1 could be affected by this if building takes place. It is well known that the CT1 site has mine shafts and adits; the terraced houses close by to CT1 are over 120 years old and so are not in a position to withstand the effects of ground movement in the immediate vicinity.

**Flooding**

Whilst there has only been surface water flooding once in 30 years, this could take a turn for the worse if you tarmac a very large area for housing and we could see that existing houses/gardens on Liverpool Road flooding as the water no longer has anywhere to go. This year has been a prime example of climate change in that we have an unprecedented amount of rainfall. Add this to a large scale development and I think you will find that this is a recipe for flooding.

<b>Q10 File 1</b>	6391003
<b>Attachments</b>	<a href="#">Linda Foster.png</a>

<b>Comment ID</b>	NULLP1219
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Fournier
<b>Consultee Given Name</b>	Toby
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I would like to object to the development of Keele Golf course for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The residents of Silverdale are a special case. It should be acknowledged that they are in a different category to residents of other areas who have not had to endure the continuing stench from Walley's Quarry. It is a situation that is still ongoing. Putting the residents of Silverdale through what would conservatively be 6 years of construction, with its attendant noise and dust would simply be further punishment for an already beleaguered community. Years of piledriving would hardly be fair on us.</li> <li>2. Trees. Air quality in the Silverdale area would suffer. The trees on Keele golf course provide us with clean oxygen that offsets the gasses emitted from Walley's Quarry. There can be no development on Keele Golf course until such time as Walley's Quarry is finally closed. We need the trees on the site to provide clean air to offset the effects of the quarry.</li> <li>3. Traffic. The volume of traffic in Silverdale is such that further homes would create an intolerable burden on the roads. There are already 2,561 current homes in Silverdale and the streets are lined with cars and are already becoming impassable, in particular the main arteries of Silverdale, High Street and Church Street. Road capacity would be exceeded and that is on roads that are already regularly breaking down and developing potholes. The additional pollution cannot be justified, in addition to road safety issues. Your plan would mean hundreds of addition car journeys daily, maybe even over 1000. Any development on Keele Golf course cannot and should not be accessible from Silverdale and should only be accessed from the A525.</li> <li>4. over-development. There has already been development at the Sutton Avenue site, a new estate at the top of cemetery Road and a development in pepper Street- Nearly 1000 new homes in Silverdale is colossal over-development.</li> <li>5. Flooding. There has been no site-specific flood risk assessment. The available document put forward by you are general considerations for the wider area of Newcastle under Lyme.</li> <li>6. There has been a groundswell of local support for Keele Golf course to be turned into a nature reserve for Local people. The wishes of the residents have been so far completely ignored.</li> </ol>
<b>Q7 Modification</b>	<ol style="list-style-type: none"> <li>1) Respecting the wishes of the local community who wish to see Keele Golf course become a nature reserve.</li> <li>2) Public acknowledgement that no further development will commence until Walley's Quarry has closed</li> <li>3) Confirmation that there will be no access to any development from Silverdale and that all access will be from the A525</li> <li>4) A site-specific flood risk assessment</li> </ol>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I am a resident of Silverdale who will be directly affected by the proposed development

<b>Comment ID</b>	NULLP404
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Family Name</b>	Fox-Hewitt
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Borough local plan at Regulation 19 stage
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>As the ward Cllr for Bradwell, whilst i am satisfied with the proposed housing development plan, i am dissapointed that the plan fails to establish or provide suitable information on the following areas;</p> <p>Integrated Care - Bradwell Hospital care hub, GP centres</p> <p>Integrated Transport Plan</p> <p>Green Space Preservation</p> <p>Investment in Community facilities</p> <p>Roads and Infastructure</p> <p>Flood and drainage improvments</p> <p>Education Provision</p>
<b>Q7 Modification</b>	<p><b>Integrated Care - Bradwell Hospital care hub, GP centres</b></p> <p>Bradwell has the largest proportion of dwellings and residents in the whole borough, and an elderly demographic, despite this it still has no GP practice - at present residents must get taxi's to Chesteron or Silverdale to see a doctor which is causing pysical and financial hardship.</p> <p>Under the County Council and combined healthcare plans, a new integrated Care Hub at Bradwell Hospital for North Staffordshire with intermediate step down care and wider health provisions is planned - yet the plan makes no reference to this - land supply, transport links, accessibilty , demands on the local infastrucure. This seems a glaring omission.</p> <p><b>Integrated Transport Plan</b></p> <p>The local plan again makes no reference to bus, rail or road demands and the infastructure needed at present never mind that which will be required with an additioanl 8000 homes. Many hundreds of residents report issues of social isolation, and difficulty accessing health and educational provisions, due to the poor to none existant bus network. There appears no plan to address this.</p> <p><b>Green Space Preservation</b></p> <p>Residents and community groups have long campgained to have protected green space preservations orders on the Bradwell dingle, Bradwell woods, the crematorium field and behind the listed Bradwell Lodge. The plan has no future strategy for protected green spaces.</p> <p><b>Investment in Community facilities</b></p> <p>The community facilities in the ward are very dated, defective and not fit for purpose. Despite an increasing population under the plan, there appears no strategy on upgrading facilities</p> <p><b>Roads and Infastructure</b></p> <p>The roads across the ward urgently need resurfacing - pavements are defective with several accidetns having been reported. The drainage channel underneath bradwell Lane - a main A road and aerterial route has collapsed causing repeated flooding. The plan like all of the areas above, proposes increase in housing yet does not evidence any duty to cooperate or collaborate with neighbouring authorities or tiers of local government.</p> <p><b>Flood and drainage improvments</b></p> <p>as above</p> <p><b>Education Provision</b></p> <p>Schools (Sun academy, Bursely academy, The Orme (Wolstanton high) are all at capacity. No plan to provide investment, capacity or resilience.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	If the inspector has questions on the areas identified above then i am happy to take part in a hearing session.

<b>Comment ID</b>	NULLP772
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Fradley
<b>Consultee Given Name</b>	BJ
<b>Agent Company / Organisation</b>	Mr BJ Fradley
<b>Agent Family Name</b>	Anderson
<b>Agent Given Name</b>	Grant
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p>I am writing on behalf of Mr BJ Fradley who is the owner of the majority of the site allocated in the draft plan as allocation CT1 Land at Red Street and High Carr Farm, Chesterton.</p> <p>Mr Fradley supports the allocation and is keen to bring forward the site for development at an early stage. As the Council is aware Mr. Fradley has already submitted supporting technical information to demonstrate how the site can be brought forward for development and the conclusions of those assessments are not repeated here.</p> <p>In terms of the details of policy CT1 of the plan, criterion 2 provides:-</p> <ol style="list-style-type: none"> <li>1 <i>Access to the development being:-</i></li> <li>2 <i>Via a left in / left out junction on the A34, utilising and improving the existing Bell's Hollow Junction onto the A34: and.</i></li> </ol> <ol style="list-style-type: none"> <li>1 <i>Provision of two access points along Talke Road</i></li> </ol> <p>The terms of point 2 reflect the transport technical note provided by SCP which set out an access strategy for the site proposing three access points (two on Talke Road and also utilising the left in/out junction off the A34). The SCP report was prepared on the basis of a bigger site area and was proposed to support the development of upto 900 dwellings. Since the date of the SCP report the size of the site and the CT1 allocation has been reduced to c.530 dwellings. On the basis of that reduced allocation, it may not be necessary for all three access points to be provided and it may be possible to access the site utilising the two Talke Road access points only. We shall discuss the details of this further with the Council and whether it would be appropriate to amend point 2 accordingly.</p> <p>In terms of delivery, I confirm that Mr. Fradley is working to bring forward the site for development at an early stage of the plan period with earthworks starting in 2026 and dwellings coming forward from 2027. I also confirm the site is receiving considerable market interest.</p>

<b>Comment ID</b>	NULLP7
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Franklin
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p>The Local Plan</p> <p>A parcel of land north of Mucklestone Wood Lane and east of Rock Lane has been marked for future housing development.</p> <p>There have been three previous proposals, the last one for 130 dwellings was unanimously rejected by NULBC Planning Committee earlier this year.</p> <p>The land is outside of the village boundary, there is nothing in the plan to expand the boundary.</p> <p>All the objections to the development still remain the same, nothing has changed, it is still Green Belt and agricultural land, with mineral resources below ground.</p>
<b>Q7 Modification</b>	<p>There is a need for a viable improvement in public transport so people can get to work in Newcastle under Lyme or Stoke on Trent or Shrewsbury/Telford. There is no employment in the village.</p> <p>The needs to be improvements in education and health facilities. Nothing is mentioned in the plan specifically about Loggerheads</p>

<b>Comment ID</b>	NULLP8
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Franklin
<b>Consultee Given Name</b>	Penny
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>.129 - site 'adjacent' to the northern boundary i.e. it is outside the existing VILLAGE envelope. It is a green field site (the only brown field site is LW87) and would reduce the amount of agricultural land available for the country's food security.</p> <p>.130 - existing 'facilities' - shops very very limited, no doctor or dentist surgeries. The public transport is virtually non-existent and definitely does not provide a service for commuting to/from work.</p> <p>.131 - site allocation proposes 130 dwellings - yet Policy PSD3 'expects' Loggerheads to accommodate 450 dwellings - there is no indication where the other 320 will be built.</p> <p>.132 - 'access' via Muckleston Wood Lane. It is a LANE and not suitable for a large amount of traffic, with no footpath or street lighting for a large portion of it.</p> <p>.133 - this junction is extremely dangerous when exiting Muckleston Wood Lane and again not suitable for the increase in traffic.</p> <p>.134 - 'education' - the schools are full now and do not have any extra capacity to accommodate the extra 320+ dwellings that are currently being built in the Village.</p> <p>.135 - 'potential pollution' - the additional dwellings will increase the amount of traffic fumes, adversely affecting the health and well-being of the residents on the north side of the Village.</p> <p>.136 - the proposed site is to the west of the White Farm House and if developed will be devastating to the wildlife that use the field, the mature hedgerows and trees, e.g. Plovers, Kestrels, Buzzards, Pheasants and Bats that use the adjacent Rock Lane as a thoroughfare and will be severely damaged by light from the development.</p> <p>.137 - the development will significantly increase the noise, again being detrimental to the wildlife.</p> <p>.139 - the currently infrastructure of the Village is not suitable for the increase in cars, school buses that will be required for commuters, shopping trips etc.</p> <p>.140 - 'adjustments to the overall quantum' suggests that the remaining 320 dwellings in the 'requirement of dwellings for Loggerheads' will be along the remainder of Muckleston Wood Lane. This would further reduce the available agricultural land for food production.</p>



<b>Comment ID</b>	NULLP1033
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Fraser
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I have attended the ongoing NULBC meetings regarding proposed development of the green belt in Audley Parish.</p> <p>As someone who lives in the parish, and particularly in the area affected by development rear to Raven's Lane, I would like to express my grave concern.</p> <p>The area to the top of Albert Street, where Chapel Street meets New Road bus shelter, is already fraught with danger and near misses, particularly worse at times of Ravensmead School Drop offs. This is made worse by large vehicles tending to park at the junction and block off views for emerging vehicles and crossing pedestrians at Albert Street. Already Albert Street - Edward Street - Diglake Street traffic is fraught with difficulty: Diglake Street is very narrow and busier of the two and already difficult to navigate. If things here aren't bad enough there are 2 semi-detached houses now at the corner with drives to navigate - these houses are not even occupied yet.</p> <p>Raven's Lane is increasingly difficult to navigate too. Increasing number of vehicles - particularly works vehicles parking on both side making one way access often the norm. No time is this more difficult than when M6/A500 HGV traffic diverts from the A500.</p> <p>Speaking of diverted traffic from M6/A500, this is the daily norm via Nantwich Road and Balterley. I hear that there may be access via this road for the warehouse development at Kent Hills. There is talk of a roundabout at Park Lane. Park Lane is a minor narrow road with access to properties and farms and is rarely used. How can this really be a viable option for the 100's of large vehicles which will be using this?</p> <p>I will support other villagers who have general concerns about the loss of greenbelt and overwhelming the current village infrastructure too.</p>

<b>Comment ID</b>	NULLP1495
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Friend
<b>Consultee Given Name</b>	William and Louise
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>I wish to re-iterate my previous objection to the application (attached), again for both this appeal and against possible inclusion of this site - the land to the west of Muckleston Wood Lane and north of the Rock lane at Loggerheads ,into the developing local plan - Ref LW53 . Both of these roads form clear , obvious and defensible boundaries between the developed urban land to the south/east and the open unspoilt land to the north/west, with important landscape and habitat , and the ancient heritage assets, and rural Character of the 'Doomsday' village of Muckleston , and its peripheral farms . These lines should not be 'crossed' for the reasons set out in two planning refusals , one appeal refusal and the numerous letters of objection from local residents , businesses and democratic representatives , as well as those reasons previously identified in previous local plans and loggerheads parish plans hitherto . There can be no justification in reversing these planning constraints - of the use of prime agricultural farmland , population pressure upon and disturbance of, the remaining hinterland , contamination of the Bearstone water catchment area, pressure on the ancient woodland sites and wetland habitats and unimproved traditional species rich meadows of Church Farm, Muckleston , the forty acres wood (with rare bilberry stands) , Winnington and Willoughbridge and adverse impact on the White House Farm agricultural holding , both its own heritage assets, with listed farmhouse etc., the holding itself which is likely to be rendered unviable by the loss of its main block of readily workable arable land - as opposed to the other lower lying heavy clay land, and the special landscape character of this prominent hill top feature of the farm itself in the surrounding landscape and its biodiversity value.</p> <p>I urge the appeal's inspector , and local plan inspectors to uphold the previous decisions made by the elected members and officers. I do not believe the allocation of this LW53 site , that would 'jump' Muckleston wood lane and rock lanes , eroding the rural character of the land on the north and eastern sides of them , is a sustainable location for the reasons cited previously by many and therefore contrary to NPPF 2023 and should both, be dismissed again at appeal, and struck out of the draft plan , to remove this threat from blighting the ' Muckleston Woods ancient woodland habitats and landscapes , that it has been my 'mission' to enhance and protect [redacted by admin]</p> <p>Muckleston Business Centre</p> <p>With regard to the local plan , I would also ask officers to further underscore the positive role of 'Muckleston Nurseries ' and 'Muckleston Business Centre' have to play as a valuable employment site, for the existing settlement of loggerheads , as identified by the previous loggerheads local plan, (attached). It offers a range of enterprises and facilities that complimentboth the 'built' heritage assets of the conservation area, the parkland/garden /arboretum settings of the business units and nurseries , and then the natural landscape and biodiversity features , 'wild' meadow and grassland areas, pond areas , and woodlands beyond , which all allow the public (my neighbours, tenants and customers) access to , benefit from, engagement with and enjoyment of this local environment , and thereby generates the means and justification in their positive ongoing 'wilding', management and enhancement.</p> <p>Please find my 'Muckleston woods' woodland management plan, setting out my detailed objectives for the woods , my option map, , and a copy of my HLS ELS environmental stewardship option schedule and cover page for my 'Church Farm' holding, HLS/ELS stewardship agreement, which I believe would be severely harmed and compromised by this proposed intrusive development on the adjoining land and on the skyline, eroding this area's exceptional rural landscape , habitat diversity and biodiversity , by urban intrusion [Admin note: option map and environmental stewardship agreement available on request. Objection letter included below]</p> <p>We believe these proposals would contravene Policies N3 and N8 of the Local plan and H1 protection of the Countryside policies. It is outside the Loggerheads village envelope and contravenes the Loggerhead Neighbourhood plan.</p> <p>It is contrary to Policy ASP6 - Muckleston Wood lane (MWL), and Rock Lane provide clearly defined and defensible boundaries to the village envelope , the land extending to the north of MWL. forms a continuous block of unspoiled agricultural land of outstanding landscape character interspersed with a matrix of semi natural habitat areas of important ancient woodland, natural woodland , spring fed ponds and areas of preserved species rich meadows., natural culm pasture , and wildlife corridors of shelterbelts , hedgerows and stream margins . These areas form the headwaters of the Bearstone water catchment .</p> <p>The rest of the water in this vicinity to the south of MWL flows south into the Tagedale brook , joining the river tern further downstream at Oakley</p> <p>Any proposed development of this land therefore represents a significant threat to this important high grade catchment and the underground aquifers. These also feed the historic private water supplies at Muckleston Village , that gave rise to the original location of the village, and the dedication of the Church to 'St. Mary', as the successor to earlier pre-Christian 'mother earth' deities venerated at 'holy springs' such as these. .</p> <p>The development of the Tagedale quarry has pushed development outside the village envelope , but this was granted at appeal presumably on the basis of it being previously developed commercial/ brown field land and so this large scale residential development should not be taken as a precedent to allow further such developments to 'jump' across to the north of MWL or to the East of Rock Lane . It is a</p>

normal planning condition on such quarry sites , that they should be restored to either agricultural land , or to environmentally advantageous natural habitat, and it is unfortunately that such terms were not enforced and implemented in this case . The quarry could have been used to provide a useful habitat area and public open space/amenity , rather than pushing residential development out into the agricultural landscape , with the knock on effects threatening that adjoining rural landscape with the effects of urban intrusion.

The loss of this large area will represent a significant loss of high grade versatile farmland . These are the two best and driest arable fields at Whitehouse farm which is a typical 150-200 acre holding of the area , formerly part of the Meynall estate . The Hunters point development to the south of MWL has already been lost from the holding a generation ago. At the time the impact of residential development on the area was thought to be less than gravel extraction. The further loss of these fields would further threaten the future of remainder of the holding as a viable independent , or semi-independent unit, and its continued role as a green 'buffer' or boundary between the intensive residential development to the south of MWL, and extensive traditional semi natural landscape to the North. . The planning history hitherto shows a usual pattern of sustainable farm developments and small scale diversifications , in line with local and national policies. It should be understood that WHF is a mixed arable and livestock holding ,a former dairy farm. It is policy that new livestock buildings are built over 400m from the nearest protected dwelling (off the holding). The building of these houses in such close proximity to the farmstead buildings will essentially negate their future use for livestock housing (which is essential during the winter months due to the wet nature of most of the rest of the farm).

These two fields are comprised of a significant gravel deposit, known as the bunter pebble beds, continuing on from the Tadgedale Quarry deposits. The local plan identifies that these should be preserved as a strategic asset for the future, as neighbouring quarries at Alington , Willoughbridge and Whitmore are exhausted. .

The application site is at an extremely visible location , It would overlook and make an overbearing visual intrusion on the skyline of the otherwise unspoilt and secluded countryside landscape to the north. The Loggerheads neighbourhood plan shows photos of the uninterrupted view from Whitehouse farm westwards to the Welsh hills , which would be lost , as well as the reciprocal view from the whole of North Shropshire back to WHF, and its wooded backdrop which is a well known local landmark, as the name suggests, in the landscape . The site was chosen by the North Shropshire Ed Authority , for its line of site microwave links to the majority of its schools and establishments in the North Shropshire area. Whitehouse farm , with its established views is also used by local churches on Easter Morning to watch the Easter sunrise from , due to its wonderful location as a viewpoint . .

The development opposes policy B5 of the local plan , by being in close proximity to the main farmstead , and the Whitehouse farmhouse which is Grade 2 listed , spoiling the setting of it .

**The Rock lane**  
This is a green lane leading to Mucklestone. It is publicly maintained as far as Ranworth Kennels , but beyond that the remainder is unadopted , maintained by the adjoining land owners (chiefly myself and my predecessors ) . It is popular with joggers and dog walkers , but is also 'abused' by users of unlicensed motorcycles and quadbikes etc. Fly tipping of garden waste with invasive alien species and diseased plant matter , poses increased risks to native semi-natural habitats along the lane and beyond. Several garden species are present along the lane , such as *Lamium gleobdolen florentinum* , banned as an invasive alien species under the Wildlife and countryside act, and *Phytophthora ramorum* (oak dieback disease) is present in the area on *Rhododendron ponticum* plants. I am endeavouring to reduce or eliminate these and manage and encourage the native woodland species , both along the lane and beyond. There is at present limited 'conflict' between the pedestrian leisure users and limited farm and access traffic , the use will increase substantially with the use by the new residents of the Tadgedale quarry , backing onto the lane. Issues of trespass over the Protected habitat and livestock areas will increase , together with antisocial use of unlicensed vehicles , uncontrolled dogs and fly tipping.

The Mucklestone wood road narrows at the top and it is a dangerous junction onto the A53 this is highlighted in the Neighbourhood plan too! It is unsuited to increased use , and to widen it would require detrimental removal of adjoining shelterbelts , hedgerows and historic buildings on private land along its margins, irreversibly harming it's rural character .

We do not believe the existing infrastructure can support so many new homes in the village  
There is a woeful lack of transport links, healthcare facilities and local amenities . Any residents of affordable housing, the elderly or the young ,without cars, are effectively 'trapped' without access to jobs , public amenities, healthcare or social interaction. This in turn can lead to other social issues and antisocial behaviour amongst the young . In particular the main commuter route along the A53 back towards the rest of the boroughs' facilities faces two accident black spots with appalling visibility and long traffic delays at peak times where it crosses the A51 at 'Blackbrook' and 'The Swan with Two necks' . No provision has been made to improve these two perilous junctions .

The electrical grid is currently over capacity , due to the high demand from Mueller's , with no opportunity for extra connections for green energy generation .

We urge officers and inspectors to refuse this application as it not an appropriate development for this prominent rural location for the reasons given above

#### Attachments

[1364678 Friend Loggerheads NP.pdf](#)

<b>Comment ID</b>	NULLP955
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Fuller
<b>Consultee Given Name</b>	Ross
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that: "A minimum of 7,160 dwellings will be delivered in the Borough of the Plan period 2020- 2024 which equates to 358 dwellings per annum." Notwithstanding the above, the draft National Planning Policy Framework identified that the Borough will need to deliver a further 193 dwellings per year in addition to this amount, which is likely to be accommodated through a future review of the plan.</p> <p>The site adjacent to 3 Highways Lane would contribute (albeit small) to the Council's housing provision.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Land at 3 Highway Lane, Keel site should be included within the settlement boundary for Keele in the Policies Map.
<b>Attachments</b>	<a href="#">1345205 R Fuller Land Adj. 3 Highway Lane, Keele.pdf</a>
<b>Comment ID</b>	NULLP959
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Fuller
<b>Consultee Given Name</b>	Ross
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that: "The Green Belt boundary is defined on the draft Policies Map."</p> <p>Criterion 2 of this policy states that: "The Green Belt boundary will be altered through this Plan to:</p> <p>b. Establish an inset boundary at Keele."</p> <p>Paragraph 6.29 of the supporting text to this Policy states the following: "The Green Belt Village Study (2019) sets out the evidence for establishing a new inset boundary at Keele. A detailed assessment of a potential inset boundary is included in the study and comments are being sought on the approach outlined during the consultation on the Local Plan." [Knights' emphasis]</p> <p>It is the 2019 Arup Green Belt Village Study which recommended that the development plan status of Keele change from a village which is washed over to a village inset. Chapter 4 'Village Assessments' of that Study sets out the area to be assessed and uses the 2011 infill boundary (Figure 1 above) as a starting point. The boundaries have however been extended to include built curtilage including all the residential properties along Highway Lane. Top Farm to the north of the village has been excluded from the boundary given it is set back from the roads.</p> <p>The justification for defining the section of village boundary around Highway Lane was: "The boundary includes the main cluster of development and the ribbon development along Highway Lane. It retains much of the existing infill boundaries from the Newcastle-under-Lyme Local Plan 2011 however has been extended to include the full extent of the built curtilage of the village including all of the residential properties along Highway Lane."</p> <p>This representation requests that the Council extend the village inset boundary to allow for our client's site, which is located on the junction of Highway Lane and Station Road. Including this small site would simply square off (as illustrated in Fig.2 below) the inset boundary and to do so makes sense on the ground, as would be observed with a site visit. It would also make sense to extend the village boundary around the driveway adjacent property of The Orchard (to the northwest of the site). The property of the Orchard itself is proposed to be included within the new settlement boundary but not the access.</p> <p>The site does not form part of Top Farm and is distinguished from it via boundary features and being of a different, non-agricultural appearance. It largely comprises overgrown scrub and contains some built</p>

form by way of utility apparatus. It has two road frontages. The site also includes the access track to the adjacent property of The Orchards.

It is evident that our client's site is clearly framed by built development to the east, south and west, which overall obstructs views of the Green Belt beyond. The immediate context of the site has materially changed recently with the construction of the large Seddon Homes residential estate, located immediately across the road to the east.

It is therefore advanced that that this site does not make an important contribution to the openness of the Green Belt.

There are no technical issues associated with developing the site. There is an existing field gate to the site, which would be replaced with a domestic access to serve one dwelling (as do all dwellings on to Highway Lane), and an ecology survey is attached as Appendix B, which sets out that there are no ecology issues.

The 2019 Study sets out some defining features of this part of the village (within the Assessment Proforma for Keele). These are listed below with a response:

a) There is a linear development extending along Highway Lane. Response: this linear character would continue.

b) The western section of the village along Highway Lane consists of detached dwellings with large gardens. Response: this would continue: one dwelling with a large garden is proposed.

c) Properties within the village are 2 storeys high. Response: this would continue; the dwelling would be 2 storeys high.

d) The western sections of the village are particularly clearly defined due to the building and garden lines. Response: this would continue: one dwelling to front Highway Lane with a rear and front garden.

e) On the whole views into and out of the village are mostly restricted by built form, with the exception of the linear development along Highway Lane. Response: linear development would continue.

As stated previously in this report, the draft National Planning Policy Framework supports sustainably located sites within the Green Belt to be used to deliver the identified housing growth, including sites that fall within the definition of Grey Belt.

Whilst the site does not comprise a previously developed site, it can nevertheless be defined as a Grey Belt by virtue of it comprising 'any other parcels of land and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes'. It is considered that the site itself does not contribute towards the five purposes of the Green Belt as set out in paragraph 143 of the current National Planning Policy Framework as demonstrated below:

"to check the unrestricted sprawl of large built-up areas" – The rounding off of this infill element along Highway Lane would not result in the increase in size of the Staffordshire conurbation as it would involve the enlargement of the village of Keele.

"to prevent neighbouring towns merging into one another" – The proposed allocation of this site would retain a substantial gap between the villages around Keele. Indeed, this infill development along the current ribbon development along Highway Lane would be barely discernible from beyond Keele itself.

"to assist in safeguarding the countryside from encroachment" – The site would be reinforced by established, defensible boundaries along Highway Lane. The proposal would also reinforce these existing boundaries through new landscaped areas (including BNG enhancements).

"to preserve the setting and special character of historic towns" – Keele is a village in conservation area (rather than a history 'town') and in any event the infilling of this gap along Highway Lane would assimilate within the established ribbon development along Highway Lane.

"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" – The provision of an additional dwelling on this site would not conflict with the wider development strategy proposed under draft Policy PSD 1.

As a result, it is recommended that this site be also excluded from the Green Belt and instead allocated as a residential development.

In conclusion, our clients support Policy PSD5 and the principle of the village inset boundary, but request the change to the boundary so that site is excluded from the Green Belt and instead incorporated within the proposed village inset boundary. It is requested that the inset boundary be amended as illustrated in Figure 2:

**SUMMARY**

It has been demonstrated that there is a clear and robust argument in favour of including land adjacent to 3 Highway Lane, Keele within the proposed village inset boundary as set out in Figure 2 of this report. This site would be a logical addition to the village inset, which would not adversely affect the openness of the Green Belt and would not conflict with the purposes of including land within the Green Belt. Indeed, it is considered that this site would constitute a 'Grey Belt' site as defined in the draft National Planning Policy Framework.

By including some developable sites within the village (such as our client's site), this would enable some modest and proportional growth of this village which would enable the village to continue to evolve over the plan period and provide an opportunity for a young person (with strong ties to the village) to raise a family in this village. This development would also potentially contribute to the Council's requirement to support self-build dwellings.

<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Land at 3 Highway Lane, Keel site should be included within the settlement boundary for Keele in the Policies Map.
<b>Attachments</b>	<a href="#">1345205 R Fuller Land Adj. 3 Highway Lane, Keele.pdf</a>
<b>Comment ID</b>	NULLP957
<b>Order</b>	26

<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Fuller
<b>Consultee Given Name</b>	Ross
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Please see attached representations. Policy PSD 2 confirms that Rural Centres will meet some of the development need within the Borough and that this will include 'Keele Village (with University Hub)'. Policy PSD 3 identifies that Keele and Keele University will provide in the order of 600 new homes. This broad approach is supported as our client's proposal, which would help to contribute towards providing housing in these locations.</p> <p>However, given the additional housing commitments that the draft National Planning Policy Framework indicates that the Borough will now face, it is recommended that Keele can deliver greater growth than currently proposed. Importantly, paragraph 144 of the draft National Planning Policy Framework states that:</p> <p>"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." [Knights' emphasis]</p> <p>The site could be defined as 'Grey Belt' (as set out in Annex A) given its location outside of the Keele Conservation Area, its limited contribution to the five purposes of the Green Belt and its sustainable location. It is considered that this site could be one such site which would deliver an appropriate plan-led release of land in a way that would result in a logical inclusion within the village of Keele.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Land at 3 Highway Lane, Keel site should be included within the settlement boundary for Keele in the Policies Map.
<b>Attachments</b>	<a href="#">1345205 R Fuller Land Adj. 3 Highway Lane, Keele.pdf</a>
<b>Comment ID</b>	NULLP958
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Fuller
<b>Consultee Given Name</b>	Ross
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy seeks to define Development Boundaries, Rural Centres and Other Settlement Boundaries within the draft Policy Map.</p> <p>Criterion 2 goes on to state that: "Within Development or Other Settlement Village Boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan."</p> <p>Criterion 4h goes on to state that new development will be supported in the open countryside: "Where the development meets a demonstrable local housing need such as affordable housing and / or self-build plots".</p> <p>The footnote to this policy goes on to state that self-build plots "must be directly adjacent to the development boundary and other residential development". Our client is broadly in support of this, as it acknowledges the need to promote selfbuild dwellings adjacent to development boundaries, and a village inset boundary is proposed for Keele. However, despite the inclusion of the policy in favour of self-build plots, the draft Policy Map excludes our client's site, the site would remain in the Green Belt and in doing</p>



	so, there would be uncertainty as to whether a self-build dwelling would be supported (if the site remained within the Green Belt).
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Land at 3 Highway Lane, Keel site should be included within the settlement boundary for Keele in the Policies Map.
<b>Attachments</b>	<a href="#">1345205 R Fuller Land Adj. 3 Highway Lane, Keele.pdf</a>
<b>Comment ID</b>	NULLP956
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Fuller
<b>Consultee Given Name</b>	Ross
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>Please see attached representations. Policy PSD 2 confirms that Rural Centres will meet some of the development need within the Borough and that this will include 'Keele Village (with University Hub)'. Policy PSD 3 identifies that Keele and Keele University will provide in the order of 600 new homes. This broad approach is supported as our client's proposal, which would help to contribute towards providing housing in these locations.</p> <p>However, given the additional housing commitments that the draft National Planning Policy Framework indicates that the Borough will now face, it is recommended that Keele can deliver greater growth than currently proposed. Importantly, paragraph 144 of the draft National Planning Policy Framework states that:</p> <p>"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." [Knights' emphasis]</p> <p>The site could be defined as 'Grey Belt' (as set out in Annex A) given its location outside of the Keele Conservation Area, its limited contribution to the five purposes of the Green Belt and its sustainable location. It is considered that this site could be one such site which would deliver an appropriate plan-led release of land in a way that would result in a logical inclusion within the village of Keele.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Land at 3 Highway Lane, Keel site should be included within the settlement boundary for Keele in the Policies Map.
<b>Attachments</b>	<a href="#">1345205 R Fuller Land Adj. 3 Highway Lane, Keele.pdf</a>

<b>Comment ID</b>	NULLP187
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	George
<b>Consultee Given Name</b>	Steven
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP228
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	George
<b>Consultee Given Name</b>	Steven
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP694
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Gibson
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I write to you in relation to the Newcastle Borough Council Local Plan – sites within Audley Rural Parish which includes AB2 – Employment Site, AB33 – Land off Nantwich Road/Park Lane, AB12 – Land east of Diglake Street and AB15 – Land north of Vernon Avenue.</p> <p>In essence I don't think any of the sites are justified or sound and should all be removed from the local plan.</p> <p>Reasons against all sites:</p> <ul style="list-style-type: none"> <li>- More people into the area, with very little public transport there will be more cars on very small roads.</li> <li>- More cars is more pollution, we have enough air pollution coming into this area from Walleys Quarry landfill in Silverdale, the landfill air pollution is worse in the winter, which is also when traffic pollution would increase as well.</li> <li>- Parking is already a problem, there are local car parks in Audley itself but much of the surrounding area has cars parked on both sides of the road due to no off road parking. Visibility is non-existent much of the time around Miles Green and Halmer End, you often proceed and hope nothing is coming in the opposite direction.</li> <li>- We have narrow Victorian streets in much of the parish which were not designed for the number of cars already here. There are many accidents to both parked and moving cars because of the amount of traffic and the speed of traffic through the narrow roads. This is only going to get worse if more vehicles and quite possibly bigger vehicles are added into the area.</li> <li>- Two of the sites are council owned farm facilities, there are young farmers wanting farms but unless you are from a farming family then this is not going to be possible with fewer/no farms to rent to get started in farming.</li> <li>- There is a bigger and bigger national population and if farmland is going to be built on then how are we going to feed the bigger population? Farmland is being built on all across the country, not just the proposed in Staffordshire.</li> <li>- Our local services such as schools, doctors and dentists are full. More housing is going to put more pressure on already stretched services.</li> <li>- There are empty warehouses in the local area but they fall under different councils. Why can't the area work together and consider the land regionally for housing and warehousing rather than each council needing to have a certain amount? Some areas of land are going to be better suited to different developments and much of these proposed sites are greenbelt and good agricultural land. Therefore the sites are not justified.</li> </ul> <p>Reasons against AB2:</p> <ul style="list-style-type: none"> <li>- Site is a huge area, 198 acres of good agricultural land in the greenbelt, this site alone is four times bigger than NULBC have said is needed, and is a bigger area than all our villages.</li> <li>- More jobs, more people into the area, no public transport so more cars on very small roads.</li> <li>- Proposed new bus routes will not fit all shift patterns so people will more likely use their cars than buses increasing traffic on the narrow roads, and cycling is unlikely as the area is all hills. We do not cycle for this reason and we haven't just done a 12 hour warehouse shift.</li> <li>- More jobs may well create pressure for more housing in the future, more loss of greenbelt near to the warehousing.</li> <li>- There are always accidents on the M6 along this stretch, we never use between junction 15 and 16 for this reason and avoid the M6 if we can go another route. Accidents always put more pressure on the surrounding local roads, our area leads to the A34 as a parallel route to the M6.</li> <li>- Emergency exits from the planned site are along single track roads with blind corners along them, not easy with current traffic, add any more along with people who don't know the roads and it is going to cause many more accidents.</li> </ul> <p>Reasons against AB33:</p> <ul style="list-style-type: none"> <li>- This site floods, ducks are seen on the water in the field.</li> <li>- More traffic on roads that are narrow, often congested and with turns on difficult to see corners, such as turning in and out of Church Street Audley.</li> </ul> <p>Reasons against AB12:</p> <ul style="list-style-type: none"> <li>- Loss of currently productive farmland on greenbelt.</li> <li>- Potential flood risks if developed, either on new development or passed further down, there are many big puddles on Bignall End Road after a bit of rain, if AB12 is developed this can only cause further floods on a much used local road to Talke and Kidsgrove.</li> </ul>

	<p>- Access and more traffic past both a nursery and a primary school. I travel (redacted by admin) during the day and it is one way traffic between the parked cars then, further cars are not going to be safe in the middle of the day let alone at school drop off and collection times.</p> <p>- Is this land being sold off by SCC being considered rather than more appropriate land?</p> <p>Reasons against AB15:</p> <p>- This site floods, ducks are seen on the water in the field.</p> <p>So to conclude, I don't think any of the sites are justified or sound for the current residents, services or wildlife and should all be removed from the local plan.</p>
<b>Comment ID</b>	NULLP696
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Gibson
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I write to you in relation to the Newcastle Borough Council Local Plan – sites within Audley Rural Parish which includes AB2 – Employment Site, AB33 – Land off Nantwich Road/Park Lane, AB12 – Land east of Diglake Street and AB15 – Land north of Vernon Avenue.</p> <p>In essence I don't think any of the sites are justified or sound and should all be removed from the local plan.</p> <p>Reasons against all sites:</p> <p>- More people into the area, with very little public transport there will be more cars on very small roads.</p> <p>- More cars is more pollution, we have enough air pollution coming into this area from Walleys Quarry landfill in Silverdale, the landfill air pollution is worse in the winter, which is also when traffic pollution would increase as well.</p> <p>- Parking is already a problem, there are local car parks in Audley itself but much of the surrounding area has cars parked on both sides of the road due to no off road parking. Visibility is non-existent much of the time around Miles Green and Halmer End, you often proceed and hope nothing is coming in the opposite direction.</p> <p>- We have narrow Victorian streets in much of the parish which were not designed for the number of cars already here. There are many accidents to both parked and moving cars because of the amount of traffic and the speed of traffic through the narrow roads. This is only going to get worse if more vehicles and quite possibly bigger vehicles are added into the area.</p> <p>- Two of the sites are council owned farm facilities, there are young farmers wanting farms but unless you are from a farming family then this is not going to be possible with fewer/no farms to rent to get started in farming.</p> <p>- There is a bigger and bigger national population and if farmland is going to be built on then how are we going to feed the bigger population? Farmland is being built on all across the country, not just the proposed in Staffordshire.</p> <p>- Our local services such as schools, doctors and dentists are full. More housing is going to put more pressure on already stretched services.</p> <p>- There are empty warehouses in the local area but they fall under different councils. Why can't the area work together and consider the land regionally for housing and warehousing rather than each council needing to have a certain amount? Some areas of land are going to be better suited to different developments and much of these proposed sites are greenbelt and good agricultural land. Therefore the sites are not justified.</p> <p>Reasons against AB2:</p> <p>- Site is a huge area, 198 acres of good agricultural land in the greenbelt, this site alone is four times bigger than NULBC have said is needed, and is a bigger area than all our villages.</p> <p>- More jobs, more people into the area, no public transport so more cars on very small roads.</p> <p>- Proposed new bus routes will not fit all shift patterns so people will more likely use their cars than buses increasing traffic on the narrow roads, and cycling is unlikely as the area is all hills. We do not cycle for this reason and we haven't just done a 12 hour warehouse shift.</p> <p>- More jobs may well create pressure for more housing in the future, more loss of greenbelt near to the warehousing.</p> <p>- There are always accidents on the M6 along this stretch, we never use between junction 15 and 16 for this reason and avoid the M6 if we can go another route. Accidents always put more pressure on the surrounding local roads, our area leads to the A34 as a parallel route to the M6.</p> <p>- Emergency exits from the planned site are along single track roads with blind corners along them, not easy with current traffic, add any more along with people who don't know the roads and it is going to cause many more accidents.</p> <p>Reasons against AB33:</p> <p>- This site floods, ducks are seen on the water in the field.</p>



	<p>- More traffic on roads that are narrow, often congested and with turns on difficult to see corners, such as turning in and out of Church Street Audley.</p> <p>Reasons against AB12:</p> <p>- Loss of currently productive farmland on greenbelt.</p> <p>- Potential flood risks if developed, either on new development or passed further down, there are many big puddles on Bignall End Road after a bit of rain, if AB12 is developed this can only cause further floods on a much used local road to Talke and Kidsgrove.</p> <p>- Access and more traffic past both a nursery and a primary school. I travel (redacted by admin) during the day and it is one way traffic between the parked cars then, further cars are not going to be safe in the middle of the day let alone at school drop off and collection times.</p> <p>- Is this land being sold off by SCC being considered rather than more appropriate land?</p> <p>Reasons against AB15:</p> <p>- This site floods, ducks are seen on the water in the field.</p> <p>So to conclude, I don't think any of the sites are justified or sound for the current residents, services or wildlife and should all be removed from the local plan.</p>
<b>Comment ID</b>	NULLP690
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Gibson
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I write to you in relation to the Newcastle Borough Council Local Plan – sites within Audley Rural Parish which includes AB2 – Employment Site, AB33 – Land off Nantwich Road/Park Lane, AB12 – Land east of Diglake Street and AB15 – Land north of Vernon Avenue.</p> <p>In essence I don't think any of the sites are justified or sound and should all be removed from the local plan.</p> <p>Reasons against all sites:</p> <p>- More people into the area, with very little public transport there will be more cars on very small roads.</p> <p>- More cars is more pollution, we have enough air pollution coming into this area from Walleys Quarry landfill in Silverdale, the landfill air pollution is worse in the winter, which is also when traffic pollution would increase as well.</p> <p>- Parking is already a problem, there are local car parks in Audley itself but much of the surrounding area has cars parked on both sides of the road due to no off road parking. Visibility is non-existent much of the time around Miles Green and Halmer End, you often proceed and hope nothing is coming in the opposite direction.</p> <p>- We have narrow Victorian streets in much of the parish which were not designed for the number of cars already here. There are many accidents to both parked and moving cars because of the amount of traffic and the speed of traffic through the narrow roads. This is only going to get worse if more vehicles and quite possibly bigger vehicles are added into the area.</p> <p>- Two of the sites are council owned farm facilities, there are young farmers wanting farms but unless you are from a farming family then this is not going to be possible with fewer/no farms to rent to get started in farming.</p> <p>- There is a bigger and bigger national population and if farmland is going to be built on then how are we going to feed the bigger population? Farmland is being built on all across the country, not just the proposed in Staffordshire.</p> <p>- Our local services such as schools, doctors and dentists are full. More housing is going to put more pressure on already stretched services.</p> <p>- There are empty warehouses in the local area but they fall under different councils. Why can't the area work together and consider the land regionally for housing and warehousing rather than each council needing to have a certain amount? Some areas of land are going to be better suited to different developments and much of these proposed sites are greenbelt and good agricultural land. Therefore the sites are not justified.</p> <p>Reasons against AB2:</p> <p>- Site is a huge area, 198 acres of good agricultural land in the greenbelt, this site alone is four times bigger than NULBC have said is needed, and is a bigger area than all our villages.</p> <p>- More jobs, more people into the area, no public transport so more cars on very small roads.</p> <p>- Proposed new bus routes will not fit all shift patterns so people will more likely use their cars than buses increasing traffic on the narrow roads, and cycling is unlikely as the area is all hills. We do not cycle for this reason and we haven't just done a 12 hour warehouse shift.</p> <p>- More jobs may well create pressure for more housing in the future, more loss of greenbelt near to the warehousing.</p>

- There are always accidents on the M6 along this stretch, we never use between junction 15 and 16 for this reason and avoid the M6 if we can go another route. Accidents always put more pressure on the surrounding local roads, our area leads to the A34 as a parallel route to the M6.

- Emergency exits from the planned site are along single track roads with blind corners along them, not easy with current traffic, add any more along with people who don't know the roads and it is going to cause many more accidents.

Reasons against AB33:

- This site floods, ducks are seen on the water in the field.

- More traffic on roads that are narrow, often congested and with turns on difficult to see corners, such as turning in and out of Church Street Audley.

Reasons against AB12:

- Loss of currently productive farmland on greenbelt.

- Potential flood risks if developed, either on new development or passed further down, there are many big puddles on Bignall End Road after a bit of rain, if AB12 is developed this can only cause further floods on a much used local road to Talke and Kids Grove.

- Access and more traffic past both a nursery and a primary school. I travel (redacted by admin) during the day and it is one way traffic between the parked cars then, further cars are not going to be safe in the middle of the day let alone at school drop off and collection times.

- Is this land being sold off by SCC being considered rather than more appropriate land?

Reasons against AB15:

- This site floods, ducks are seen on the water in the field.

So to conclude, I don't think any of the sites are justified or sound for the current residents, services or wildlife and should all be removed from the local plan.

<b>Comment ID</b>	NULLP695
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Gibson
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I write to you in relation to the Newcastle Borough Council Local Plan – sites within Audley Rural Parish which includes AB2 – Employment Site, AB33 – Land off Nantwich Road/Park Lane, AB12 – Land east of Diglake Street and AB15 – Land north of Vernon Avenue.</p> <p>In essence I don't think any of the sites are justified or sound and should all be removed from the local plan.</p> <p>Reasons against all sites:</p> <p>- More people into the area, with very little public transport there will be more cars on very small roads.</p> <p>- More cars is more pollution, we have enough air pollution coming into this area from Walleys Quarry landfill in Silverdale, the landfill air pollution is worse in the winter, which is also when traffic pollution would increase as well.</p> <p>- Parking is already a problem, there are local car parks in Audley itself but much of the surrounding area has cars parked on both sides of the road due to no off road parking. Visibility is non-existent much of the time around Miles Green and Halmer End, you often proceed and hope nothing is coming in the opposite direction.</p> <p>- We have narrow Victorian streets in much of the parish which were not designed for the number of cars already here. There are many accidents to both parked and moving cars because of the amount of traffic and the speed of traffic through the narrow roads. This is only going to get worse if more vehicles and quite possibly bigger vehicles are added into the area.</p> <p>- Two of the sites are council owned farm facilities, there are young farmers wanting farms but unless you are from a farming family then this is not going to be possible with fewer/no farms to rent to get started in farming.</p> <p>- There is a bigger and bigger national population and if farmland is going to be built on then how are we going to feed the bigger population? Farmland is being built on all across the country, not just the proposed in Staffordshire.</p> <p>- Our local services such as schools, doctors and dentists are full. More housing is going to put more pressure on already stretched services.</p> <p>- There are empty warehouses in the local area but they fall under different councils. Why can't the area work together and consider the land regionally for housing and warehousing rather than each council needing to have a certain amount? Some areas of land are going to be better suited to different developments and much of these proposed sites are greenbelt and good agricultural land. Therefore the sites are not justified.</p> <p>Reasons against AB2:</p>

- Site is a huge area, 198 acres of good agricultural land in the greenbelt, this site alone is four times bigger than NULBC have said is needed, and is a bigger area than all our villages.
- More jobs, more people into the area, no public transport so more cars on very small roads.
- Proposed new bus routes will not fit all shift patterns so people will more likely use their cars than buses increasing traffic on the narrow roads, and cycling is unlikely as the area is all hills. We do not cycle for this reason and we haven't just done a 12 hour warehouse shift.
- More jobs may well create pressure for more housing in the future, more loss of greenbelt near to the warehousing.
- There are always accidents on the M6 along this stretch, we never use between junction 15 and 16 for this reason and avoid the M6 if we can go another route. Accidents always put more pressure on the surrounding local roads, our area leads to the A34 as a parallel route to the M6.
- Emergency exits from the planned site are along single track roads with blind corners along them, not easy with current traffic, add any more along with people who don't know the roads and it is going to cause many more accidents.

Reasons against AB33:

- This site floods, ducks are seen on the water in the field.
- More traffic on roads that are narrow, often congested and with turns on difficult to see corners, such as turning in and out of Church Street Audley.

Reasons against AB12:

- Loss of currently productive farmland on greenbelt.
- Potential flood risks if developed, either on new development or passed further down, there are many big puddles on Bignall End Road after a bit of rain, if AB12 is developed this can only cause further floods on a much used local road to Talke and Kidsgrove.
- Access and more traffic past both a nursery and a primary school. I travel (redacted by admin) during the day and it is one way traffic between the parked cars then, further cars are not going to be safe in the middle of the day let alone at school drop off and collection times.
- Is this land being sold off by SCC being considered rather than more appropriate land?

Reasons against AB15:

- This site floods, ducks are seen on the water in the field.

So to conclude, I don't think any of the sites are justified or sound for the current residents, services or wildlife and should all be removed from the local plan.

<b>Comment ID</b>	NULLP1363
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Gill
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1416
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Gill
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



Comment ID	NULLP1028
Order	153
Title	Policy AB33 Land off Nantwich Road / Park Lane, Audley
Consultee Family Name	Gilmour
Consultee Given Name	Jeanette
Q4 Part of document	Policy
Q4 Policy	AB33
Q6 Details	<p>Part B - Policy: AB33</p> <p>AB33 is a <b>strong</b> contributor to the greenbelt so why look at this site and not sites that are <b>moderate</b> contribution to the greenbelt, is it because it is <b>Staffordshire County Council land</b> and they want to sell off the whole starter farm and offered it all up to NULBC. This site floods all through the year, animals and ducks surround it. The field is very boggy in the winter especially and ran all across the field last winter and into the spring. Where will all this water go if it is concreted over, it is a flat area at the bottom of Audley. The following two fields also flood greatly and I have photographs to prove this. There is a main sewage line that goes through this field. This will increase costs.</p> <p>Our garden is extremely wet in the winter, what will happen to our garden and neighbours gardens if all this green land is converted to concrete. Extra drainage would be required but with a old drainage in place now, a new supply straight down to the sewage works would be required, to prevent further increases in flooding.</p> <p>AB33 is in the wrong place to be available for what is needed for the village which is 1 bedroom homes which enables the elderly that want to downsize and stay in the village, but the topography of this site makes it inaccessible for the elderly, the hill is too steep to walk, I know this because our neighbours were unable to and no bus service comes near to here, and considering the bus services have been reduced from the main street in the village, this will not be funded, especially in the long term. You have to walk up the hill to access from the main street. A site that is an accessible place for walking to the doctors, dentists, supermarket, bus stop etc is needed for 1 and 2 bedroom homes. These would then free up the larger houses in the village. There is a small block (9) of privately owned 1 &amp; 2 bed bungalows just off the main street in Audley and has easy access to those services mentioned. These are never empty for long, they are snapped up as soon as they are on the market, because so many are wanting to downsize or families wanting to get elderly parents closer to facilities.</p> <p>Policy AB33 page 114 item 2: LP states that there would be two access points to the development , <b>secondary one on Nantwich road B5500</b>, which is a very busy country road already and many cars are parked on this road and there is not enough parking outside the homes already and at peak times, there are many delays getting through this stretch of the road, causing traffic jams especially at peak times and when HGV's are trying to get through. <b>The Primary access road on Park Lane</b>, this road was considered unsafe for an entry onto the cemetery a few years ago, so why now is it safe to have over 55 homes built meaning a minimum of 100 vehicles using this lane, this doesn't make sense, and therefore it is unsound.</p> <p>Evidence 3.74 THE NEED FOR INFRASTRUCTURE TO SUPPORT ACTIVE TRAVEL and by no car modes on AB2, AB15 &amp; AB33. 3.75 states, identified migration measures would be funded by developer's contributions - how long for? We have already had funding &amp; bus routes reduced and no travel via these means from the village after 6.30 pm. These services need to be guaranteed if elderly/young families, starter or retirement homes were to be considered for AB33, which are the types of homes that are required. If bus services are reduced now, they will not be funded for the long term. This makes it an unsustainable site.</p> <p>I live on (redacted by admin) and trying to reverse onto our drive at peak times and especially if issues on the M6/A500 are awful, the road is too busy, I can wait up to 5 minutes to be able to reverse onto the drive. Which my husband and I do, as it is such a busy road and close to a bend (many cars and Lorries exceed the speed limit of 30mph). We are also close to the entrance to the 55 housing development of AB33, how will this affect my ability to reverse onto my drive, if another 100+ vehicles, then the additional cars from the other villages Talke, Chesterton, Madeley , Crewe &amp; Alsager that will use this road to avoid J16</p> <p>There is not enough parking in the village now , with cars parked every single day on the double yellow lines, as many do not walk to the village, is this because the bus service is so unreliable?</p> <p>Housing increased by 6% over the last 4 decades in this borough but NUBC are predicting 6% per year, how can this be sound? Even if expecting to migrate growth into the area, this is not a justified reason to lose the greenbelt for a predicted possibility when we have so many empty houses already.</p> <p>Policy AB33 page 114 item 3: Where is the connectivity to existing cycle and pedestrian routes, I see no mention of the planned routes for these, which I would be extremely interested in. Especially as these country lanes are to be overrun by additional Lorries and cars. It will be impossible for me to cycle out of my door.</p> <p>Page 114 item 7: as mentioned there is flooding all year round (we have a constant lake) in this field and especially this year it stretched across the whole field and onto Park Lane. Where will all this water go?</p> <p>Page 114 item 10: what contributions and accessibility improvements to Alsager Road play area? No mention of what this is, I would advise that with the increased traffic a pedestrian crossing at the very least is needed now and especially with future development plans. It is already difficult to cross to the</p>

	<p>playing fields from Alsager road and cars can be parked on the pavement making pushchairs go onto the road. The pavements need to be widened and this is impossible.</p> <p>Has St Modwen issued a traffic impact report to NULBC and if so when was this taken, needs to be taken over a few weeks, to show the high number of vehicles this junction takes and the amount of delays that are on the rat run of B5500 to avoid Junction 16, this is a small busy country road already with traffic using it as a cut through to avoid Junction 16, especially at peak times or when there are accidents, breakdowns occurring on the M6 or A500. If 213 additional houses are developed in Audley all will join the B5500 to travel out of the village, that is potentially 500+ more vehicles with no regular bus service, that is only available from the main street of Audley, there is a steep hill to walk from AB33 to a bus stop, which makes it inaccessible for the elderly to purchase a home on AB33 or young families with pushchairs.</p> <p>There are exceptional circumstances for our borough that should be considered. The population has had more deaths than births over the last decade.</p> <p>There are 1000 empty houses in the borough, on the NULBC website. The growth is not realistic, especially if going for big growth, as the borough already have empty homes and warehouses. This does not justify losing greenbelt for the potential increased migration. Therefore this is an unsound plan.</p> <p>I have not seen any grading of the agricultural land on AB2 or for AB33, AB12, AB15. These are all good farming greenbelt.</p> <p><i>Site allocations that involve removing land from the Green Belt will provide compensatory improvements to the remaining Green Belt. These sites will also establish a recognisable and permanent new boundary to the Green Belt. These measures will be agreed with the Council as part of the preparation of site wide master planning and informed by the Green Belt Study, Landscape Study / landscape assessments, Open Space and Green Infrastructure Strategy, and biodiversity / recreational needs assessments. The scope of compensatory improvements will also be informed through early engagement with relevant landowners, key stakeholders and the local community. Compensatory measures will be secured as appropriate through the use of conditions / section 106 obligations and the community infrastructure levy</i></p> <p>From the above statement I would like to see the compensatory improvements to the remaining greenbelt, in the Local Plan, but there isn't, how can we believe that the development will end with the one field AB33 and not lose the whole farm (Pear Tree Farm), What would be needed on the B5500 road at its junction with Alsager road (mini roundabout)? For any further traffic, it would need to be widened to the mini roundabout, this is impossible as there are Victorian walls and homes along this route. Additional drainage or ponds/pools needed for all the additional water from the floods in the field now. Road humps and pedestrian crossings for the roads as it is too busy now and cars travel over the speed limit of 30mph regularly (see the data from the speed monitors). Where is this mentioned in the Plan? Provisions are needed to discourage the B5500 from been used as a cut through to avoidJ16. This is not sustainable.</p> <p>I have not had enough time to spend looking through this Local Plan and have had to look at a few of the elements that affect me. The Consultations and the use of the portals are not fit for purpose and many people have complained that it is not user friendly.</p> <p>I agree with the response from PROTECT AUDLEY PARISH GREENBELT. And like so many followers (1200 on Facebook) who have not had the stamina to reply to this Local Plan.</p>
<b>Q10 File 1</b>	6390538
<b>Q10 File 2</b>	6390539
<b>Q10 File 3</b>	6390540
<b>Attachments</b>	<a href="#">1299148 Jeanette Gilmour 1.jpg</a> <a href="#">1299148 Jeanette Gilmour 2.jpg</a> <a href="#">1299148 Jeanette Gilmour 3.jpg</a>
<b>Comment ID</b>	NULLP1032
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Gilmour
<b>Consultee Given Name</b>	Jeanette
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Policy AB2 :</p> <p>I oppose AB2 , for the following reasons, this is good agricultural, farmed greenbelt land. Newcastle under Lyme Borough Council (NULBC) are proposing to use 80 HA for employment purposes when only 22HA are required for a Strategic need. The Local Plan (LP) states:</p> <p>Employment will comprise offices, research and development, industrial processes, general industrial, storage and distribution and open storage. Yet the St Modwens document wants to build a 1 million sq ft warehouse.</p> <p>How can NULBC propose taking this extra 60HA of greenbelt land for development of big box warehousing when the borough already has numerous empty warehouses, including big box warehousing and in</p>

neighbouring boroughs? Also this is not exceptional circumstances, to lose good quality farmed agricultural land and encroach on the village.

When other warehousing/units are available and not on farmed land, one particularly on Chatterley Valley that is over 300,000+ sq ft that was empty for 7 years previously when it was first built and now empty again. JCB the previous tenants moved because the logistics wasn't right for them.

It is not effective to lose an extra 60 HA of greenbelt for this potential migration. When the towns have many empty shops and many large and small empty warehouses. AB2 land is a pollution barrier for the village from M6 & A500, we are 6th in the country for respiratory illnesses and asthma, (see the evidence supplied by a local doctor with his response to this policy AB2) which will only get worse by losing the carbon soaking trees and green fields that act as a barrier to the village.

PAPG (Protect Audley Parish Greenbelt) did a traffic survey for a few days, which I was part of, the evidence in the LP says the B5500 is a quiet road, it is an old Victorian country road, that has already had an increase in traffic, using the road as a rat run to avoid Junction 16. I recorded between 1500 - 1700 vehicles in 2 hours x 4 times. Whilst standing outside my house recording this, the fumes really came apparent, I had a sore throat and headache following my times on this road.

As HS2 has now been cancelled for this area. Junction 16 upgrades have been cancelled, it already needs upgrading for the traffic that is there now. There is a single carriageway West of junction 16 and a dual carriage way East of junction 16, both have delays every single day.

In the evidence 8.7 Strategic Employment Site Assessment, this is an assumption at bullet point 5: *The land at J16 was not assessed as part of Arup's green belt report, AS SUCH, we believe it makes a weak contribution to Green belt purposes.* I most strongly disagree with this, it is good agricultural land, which is farmed. How can an assumption become fact, if it has not been considered? Appalling.

For all the above reasons, this is not exceptional circumstances and is not a sound plan.

As an alternative to AB2 there are other sites that were shown on the reports/evidence to be more sustainable than AB2 one of these is High Carr BW2 & BW3, which skirts the A500 and access to it directly and also Talke roundabout and A34 dual carriage, opposite an industrial site, being developed for warehouses. This area is more than 22HA but not the huge amount of extra greenbelt that would be lost from AB2. Therefore less traffic on A500 J16 M6 junction, than if 80HA taken up. BW1 BW2 is not farmed land, not adjacent to homes and was previously considered as a contender site for houses, why not for the strategic employment. This type of land should be used first.

AB2 is not for local jobs, no bus service to this area. St Modwens say within 1 hour 9000 potential people for employment? This would bring in additional cars along the M6 corridor, making it unsustainable. Also the report states that a bus service will be provided and costed from charging for parking on the site of AB2. Low paid workers employed at warehouses will be expected to pay to park there to fund a bus service, what if many decide to bus in (how many buses will be needed for shift work and where are they going to be bused in from) then there isn't enough funding coming in from the parking charges? Also, the suggested lorry park on AB2 is proposed to be free of parking charges as the layby currently used is free, but on the lorry park the LP states there would be services, a toilet block, who will fund this if there isn't parking charges for the lorries. This is an unsound plan.

A bus service via A500, M6 wouldn't arrive on time, people would need to allow over an hour extra either side to ensure getting to work on time. Therefore it is not going to be sustainable or climate friendly. Extra cars travelling to this site would turn to the access roads to avoid the delays at this junction. The emergency access roads are single track small country lanes, that I bike regularly and if I meet a car or tractor, I need to move into the side of the hedge to allow these vehicles to pass. If access is used for AB2, it will become a main route into the development and will make it very unsafe for cyclist and walkers that used these lanes for exercise each day. **See photos attached of Moat Lane and Park Lane.**

I cannot see evidence based information for the need of these large warehouses on AB2 and a substantial lorry park. NULBC are planning for big growth migration, yet the warehouses we have are not filled. There are two empty warehouses in Newcastle under Lyme 300,000+ sq. ft. and 221,000 sq. ft. with numerous smaller units available in the borough. Others under development at Chatterley Valley site. Also outlining planning permission at Alsager Pannattoni Park, which is 4 minutes away from Junction 16, 1 mile, there will be 1.46 million sq ft of warehousing, with a 1 million sq ft single unit, which is also close to the railway line. Why then is AB2 even considered?

I do not believe the traffic reports for AB2/J16, when were these taken? There is already a demand for it to be upgraded way before any further development goes ahead, especially with a new development within 1 mile. How can the borough think of building even more of these big box warehouses next to Junction 16 without any upgrade and to lose this farmed good quality greenbelt land for the purpose of a potential development, with so many already empty around. **See our list of empty warehouses within 5-20 minutes' drive from Audley.**

J16: There is now no provision to improve the junction (J16) on M6, (government funding suspended) it already has a build-up of traffic in both directions of A34 every single day, but especially now HS2 has been cancelled. The west bound side is a single carriageway. Both sides build up each day especially at peak times, which then causes a rat run on the B5500 especially when issues on the A500 and M6, the B5500 is a cut through. Once there is an accident or breakdown on A500 or M6 it has an enormous effect on side roads and huge delays at Junction 16 (M6). I live on the B5500 and many articulated HGV vehicles use this road throughout the day to avoid J16.

Policy PSD6: *Health & Wellbeing*: d: The safe walking and cycling will be destroyed by AB2, the single track roads of Park Lane, Moat Lane and Barthomley road are used by many from the village especially the young on bikes and the elderly as a circular walk. The possibility of an emergency access on Park Lane and Barthomley road will make this impossible for us to use. I cycle around this 3 miles route most days, seeing elderly ladies and gents doing their regular exercise walks. We are 6th in the country for respiratory illnesses, how will this development improve this situation, it will only make it worse.

There is no mention of the Two Saints Way footpath (historic footpath that runs from Chester to Lichfield Cathedrals) that will become unsafe with AB2 as it runs on the Barthomley road.

Also point 5.36: *the council is committed to promoting healthy communities* but the amount of pollution from all these extra vehicles is extremely unhealthy,

5.39: A full screening HIA is required for this development. The villagers are not listened to by the council, we have had bus routes taken away, and now the countryside to walk safely in is proposed to be destroyed. The extra traffic and additional people to this areas infrastructure has not been considered. We can't just move to another surgery or dentist or chemist, we only have one in the village.

The evidence in this Local Plan have many assumptions.

4.2 Modelling in Strategic Transport Assessment. For instance adopting the 2011 census in their modelling, it states that 2011 used instead of 2021 but doesn't state what alterations have been made to account for this. States 7% uses buses, yet the buses have been suspended so this % should be reduced. The census talks about commuting trips to Hanley (4.2) , yet Audley has no direct bus route to Hanley anymore. But what about the additional warehouses and houses in Alsager, Crewe, again no bus service to those areas. The analysis is based on designations to Hanley, talking about Newcastle under Lyme & Stoke on Trent boroughs, but not Cheshire East and the new houses at Alsager these are not accounted for and are far closer than Hanley. This is old data.

4.3 shows data Westbound (A34-M6) from 2015-**2022** but Eastbound data from 2015-**2023**, why use different years unless it is to show it in a better light, does 2023 show higher traffic flow?

The surveys for AB2 have many assumptions, see the evidence, this modelling is not allowing for all the other sites already ahead in planning in the surrounding boroughs. With all the extra houses and warehouses built to support this already at Crewe and Radway Green, Alsager, Chatterley Valley, Loomer road etc. makes this totally unjustified. For all these reasons it is not justified to remove 80 HA of greenbelt for 22 HA therefore it is unsound.

There were 3 potential strategic sites AB2, KL15 and TK30. But at one of the drop in meetings at the Methodist church it was mentioned by a councillor that AB2 would be going ahead for the borough. This was Regulation 18. Also when the Audley Parish put in their Neighbourhood Plan they were told to include AB2, yet it was only a potential site, If NULBC wanted this including wasn't this predetermined!

Also all the consultations have had issues with the responses and their portal. There were changes made to the rules of the responses to the consultations. Emails not allowed, then they were allowed. Letters sent in with individuals copying and signing, that they agreed with the details of the letter, only for it to be used as one response, yet 600 were handed into the council offices just from the Audley area. I have had to email without using the form as it wouldn't allow for additional sheets. I hope this will be accepted.

Councillors were not given the relevant information/evidence in time to make a properly informed decision on the Local Plan, there were 9 documents out of 24 still not uploaded 2 days before the Full Council Meeting, 1 was uploaded the day before the meeting. This is not lawful because they didn't conduct it to the gunned principles.

<b>Q10 File 1</b>	6390543
<b>Q10 File 2</b>	6390544
<b>Q10 File 3</b>	6390545
<b>Attachments</b>	<a href="#">1299148 Jeanette Gilmour AB2 1.jpg</a> <a href="#">1299148 Jeanette Gilmour AB2 2.jpg</a> <a href="#">1299148 Jeanette Gilmour AB2 3.jpg</a>

<b>Comment ID</b>	NULLP1253
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Gilmour
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy AB15/AB12/AB33</p> <p>I oppose this because it is too many houses for Audley Parish , it is not justified to lose so much greenbelt, there are not exceptional circumstances, therefore it is unsound. The roads that run through Audley/Signall End, are country B5500 roads with cars parked either side.</p> <p>AB12:</p> <p>Also the access is down a very narrow street , single track road with cars parked in both sides. Rows of terraced houses</p> <p>Again this and AB33 are Staffordshire county council land, why put in strong contributors to greenbelt when there were moderate contributors to the greenbelt. Is it because it is staffs county council land?</p> <p>AB12/15/33</p> <p>The main reason is the amount of traffic that will be generated through the narrow roads. Already the B5500 and Alsager road to the A500 are rat runs and throughout the day articulated vehicles HGV, OGV1&amp;2 use this road as a cut through to avoid M6 junction 16 and Talke roundabout. In 2 hours on three occasions I counted between 1350-1750 vehicles using the mini roundabout at the junction of B5500 &amp; Alsager road. The larger vehicles have damaged the roundabout many times and only this year have had it re tarmace'd after having huge potholes for over 12 months.</p> <p>If there is an accident or breakdown on the A500 or M6 near j16, the amount of traffic must double, the traffic is queuing along B5500 with hgvs and commercial vehicles blocking the roads.</p>
<b>Attachments</b>	<a href="#">1299149_JohnGilmour.pdf</a>
<b>Comment ID</b>	NULLP1264
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Gilmour
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy AB15/AB12/AB33</p> <p>I oppose this because it is too many houses for Audley Parish , it is not justified to lose so much greenbelt, there are not exceptional circumstances, therefore it is unsound. The roads that run through Audley/Signall End, are country B5500 roads with cars parked either side.</p> <p>AB12/15/33</p> <p>The main reason is the amount of traffic that will be generated through the narrow roads. Already the B5500 and Alsager road to the A500 are rat runs and throughout the day articulated vehicles HGV, OGV1&amp;2 use this road as a cut through to avoid M6 junction 16 and Talke roundabout. In 2 hours on three occasions I counted between 1350-1750 vehicles using the mini roundabout at the junction of B5500 &amp; Alsager road. The larger vehicles have damaged the roundabout many times and only this year have had it re tarmace'd after having huge potholes for over 12 months.</p> <p>If there is an accident or breakdown on the A500 or M6 near j16, the amount of traffic must double, the traffic is queuing along B5500 with hgvs and commercial vehicles blocking the roads.</p> <p>Policy : AB34</p> <p>On AB33 the field floods constantly, we have had a lake in this field for a few years now. Concreting over this is going to cause major issues to the surrounding properties.</p> <p>There are sewers in this field also that need attention.</p>
<b>Attachments</b>	<a href="#">1299149_JohnGilmour.pdf</a>
<b>Comment ID</b>	NULLP1259



<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Gilmour
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy AB15/AB12/AB33</p> <p>I oppose this because it is too many houses for Audley Parish , it is not justified to lose so much greenbelt, there are not exceptional circumstances, therefore it is unsound. The roads that run through Audley/Bignall End, are country B5500 roads with cars parked either side.</p> <p>AB12/15/33</p> <p>The main reason is the amount of traffic that will be generated through the narrow roads. Already the B5500 and Alsager road to the A500 are rat runs and throughout the day articulated vehicles HGV, OGV1&amp;2 use this road as a cut through to avoid M6 junction 16 and Talke roundabout. In 2 hours on three occasions I counted between 1350-1750 vehicles using the mini roundabout at the junction of B5500 &amp; Alsager road. The larger vehicles have damaged the roundabout many times and only this year have had it re tarmace'd after having huge potholes for over 12 months.</p> <p>If there is an accident or breakdown on the A500 or M6 near j16, the amount of traffic must double, the traffic is queuing along B5500 with hgvs and commercial vehicles blocking the roads.</p> <p>Policy : AB15</p> <p>Has historic tunnels running through the field. Development here will affect the village main street greatly. There isn't enough parking in the village now and many park over the double yellow lines. The additional traffic coming via Vernon avenue will lead onto the church street. With parking on the pavements and double yellow lines, there will be hold ups all the time. There needs to be a traffic assessment for church street, which would identify the need for the street to be widened, but it isn't possible, therefore it is unsound.</p> <p>For all these reasons, the greenbelt should not be proposed for development and an alternative planned on lesser quality land like BW1&amp;2 which was a contender site but not carried forward to reg 19, is this because it's staffs county council wanting to see their land. There are moderate contributors to the greenbelt but this Local Plan has decided on Strong contributions to the greenbelt, again, why, again is it Staffordshire county council wanting to sell. That should not be considered when there is lesser quality grow available. The plan is unsound.</p>
<b>Attachments</b>	<a href="#">1299149_JohnGilmour.pdf</a>
<b>Comment ID</b>	NULLP1271
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Gilmour
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy: AB2 :</p> <p>This is not justified losing 80HA of greenbelt agricultural farmed land, when only 22HA required on this local plan, even this is an over estimated amount, when we have so many empty warehouses already in this area, large warehousing over 300,000 sq ft, with others in the surrounding boroughs already getting built and others have planning permission. Junction 16 has many holdups everyday already and needs extensive upgrading now. There has been many units built for HS2 that has now been cancelled, therefore too many units/warehouses in this area. No upgrade of junction 16, makes this plan unsound.</p> <p>There are the country lanes around Audley Parish that are used as a cut through to avoid junction 16. On B5500, this needs addressing, and measures put in place, not by putting up signs as is suggested in the Local Plan, it needs to have something to stop the large vehicles on this rat run. The roads can't be widened. A mini roundabout was added to this road but it hasn't deterred these vehicles at all and have damaged the roundabout roads extensively.</p> <p>This has not been thought through and is in justified and completely unsound.</p>
<b>Attachments</b>	<a href="#">1299149_JohnGilmour.pdf</a>



<b>Comment ID</b>	NULLP250
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Ginnis
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The site of AB2 is located on greenbelt land. This land provides a natural break between Audley and the motorway and main highways to the north west. Building on such an extensive scale will destroy an area of natural beauty and decimate the area of wildlife.</p> <p>Whilst the planned entrance to the site from the motorway, any disruption due to an accident or other significant incident will result in increased traffic in Audley and the surrounding villages as drivers look for alternative routes. This will cause major problems as the infrastructure already struggles to cope with heavy traffic and the likely increase in large freight vehicles will cause havoc. This can already be witnessed when there are problems on the A500 or around junction 16 of the M6 motorway. I so not think that this has been taken into account. Additionally, the planned emergency access via Barthomley Road is unsuitable. The road is narrow with high hedgerows in places, making visibility for driver difficult. Any prolonged use of this access would cause major problems to Audley and the surrounding villages.</p> <p>There are already a number of warehousing units in Newcastle, Stoke-on-Trent and South Cheshire some of which are standing empty. I do not believe that there is sufficient evidence that further warehousing is required. Public transport to the planned site is virtually non-existent and so employees are almost certainly going to be traveling by car, putting a further burden on the A500 and other roads. Many of the roads close to the site are minor country lanes and it is likely that many drivers will be using these to bypass the major routes, causing significant problems to local residents within both Staffordshire and Cheshire.</p>
<b>Q7 Modification</b>	Remove the site from the Local Plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP251
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Ginnis
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The use of Greenbelt land should be kept to a bare minimum. The Local Plan seems to take little account of the impact to rural areas of building extensively on Greenbelt land. Many residents move into the parish of Audley and remain there because of the rural aspect of the area. Building large housing developments destroys this aspect and thereby the very character of the area.</p> <p>The volume of houses proposed is out of proportion to the housing need. Between 2011 and 2021, the population for Newcastle-Under-Lyme has decreased. Whilst some additional housing is required, there is no evidence to support a need for so many new houses.</p> <p>The current infrastructure is unable to support so many additional residents. The local primary school are close to full capacity and Audley Health Centre is already struggling to meet the needs of the local population. Roads are barely coping with the existing levels of traffic and on-street parking is becoming a hazard. The area is poorly served by Public Transport. It is also doubtful that the local sewerage and rainwater drains as well as the sewage treatment works could cope with the increase in volumes.</p>
<b>Q7 Modification</b>	Scale down the proposed number of housing sites and the overall number of housing. Alter the weighting of types of housing in favour of more social housing, affordable housing and housing for the elderly.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP252

<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Ginnis
<b>Consultee Given Name</b>	Neil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The site is located in Greenbelt land and the planned extensive building will destroy the the rural character of Bignall End. The current views enjoyed by the residents of Ravens Lane, Diglake Street, Hope Street and Bignall End Road will be decimated. This, in turn, will substantially devalue the properties.</p> <p>The utilisation of the Greenbelt land for building will also destroy natural habitats for the local wildlife. In the first draft of the Local Plan, the site was classified as being a strong case for remaining as Greenbelt. This seems to have now been disregarded.</p> <p>Diglake Street is narrow and completely unsuitable to take the additional traffic for accessing the site. Alternative access from Ravens Lane would exacerbate already problematic traffic on Ravens Lane.</p> <p>The volume of houses proposed is out of proportion to the housing need. Between 2011 and 2021, the population for Newcastle-Under-Lyme has decreased. Whilst some additional housing is required, there is no evidence to support a need for so many new houses.</p> <p>The current infrastructure is unable to support so many additional residents. The local primary school are close to full capacity and Audley Health Centre is already struggling to meet the needs of the local population. Roads are barely coping with the existing levels of traffic and on-street parking is becoming a hazard. The area is poorly served by Public Transport. It is also doubtful that the local sewerage and rainwater drains as well as the sewage treatment works could cope with the increase in volumes.</p> <p>AB12 has significant drainage issues. The site suffers from a high water table, possibly due to the flooding of the Diglake mining works following the mining disaster some years ago.</p> <p>I don't believe that the Borough Council has fully considered all of the above factors in coming to their decision regarding this site.</p>
<b>Q7 Modification</b>	Remove or substantially reduce the size of the site as there is no justification for such a large housing complex at the location.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP161
<b>Order</b>	202
<b>Title</b>	Policy SP2 Cheddar Drive, Silverdale
<b>Consultee Family Name</b>	Gleaves
<b>Consultee Given Name</b>	Marie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Plans for Cheddar Drive, the plans are only for home building and do not include a retail premises. The one shop that remained on the site before the demolition, was used enough to make it a viable business.</p> <p>It was also a lifeline for many of the elderly people on the estate who do not have their own cars and are reliant on a bus service that is not the best at being a reliable option (especially in bad weather) when buses cannot make it onto the estate.</p> <p>Please reconsider not including some form of retail outlet.</p>
<b>Q7 Modification</b>	Add a retail outlet/shop.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1148
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Godwin
<b>Consultee Given Name</b>	Anthony
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Please find below my further objection to the planned development of green belt land east of Diglake Street (AB12).</p> <p>It is my belief that the site should be removed from the local plan for the following reasons:</p> <p><b>Traffic and Parking</b></p> <ul style="list-style-type: none"> <li>- The planned development will see a huge increase in traffic through Bignall End, and especially through Diglake Street - areas where (redacted by admin) will now become the transit route for lorries and heavy machinery.</li> <li>- The proposal for a parking area to clear Diglake Street of cars is ludicrous at best and manipulative at worst. How are the residents meant to receive food and fuel deliveries? What will the impact be to the adjacent streets when the proposed parking area is either full or completely ignored owing to it being an inconvenience to residents? Having already had conversations with some of the elderly residents of Diglake Street, I can also say that this is already having a detrimental impact on the health and wellbeing of those who will be affected.</li> </ul> <p><b>Green Belt and Rural Protection</b></p> <ul style="list-style-type: none"> <li>- The land is greenbelt; productive greenbelt. It recently had livestock on it, and it is now currently covered in hay bales - it is not wasteland, degraded land or "grey belt" land. It should remain as greenbelt land, otherwise what is the point in having a greenbelt? The current proposals would destroy productive land, endanger food security and further destroy wildlife, not to mention the increase in light pollution.</li> <li>- Building on this greenbelt land is going to exacerbate the risk of flooding in the local area, and well as flooding to the current residents who already have to deal with a high water table. It is also going to vastly increase the risk of pollution entering the local brook which runs adjacent to the site.</li> </ul> <p><b>Local Concerns</b></p> <ul style="list-style-type: none"> <li>- Bignall End is a village, but these plans will destroy the rural character of the village. They will overload our services and ruin the village.</li> <li>- The roads in the village are already hard to navigate with the current amount of traffic. Introducing potentially hundreds more vehicles into the village is going to be incredibly detrimental.</li> <li>- The local services will not be able to absorb hundreds of new residents.</li> <li>- The local infrastructure is already below standard. There are regular mini power cuts, and many full power cuts. Adding more housing to an evidently overloaded grid is going to make things worse.</li> <li>- The development of land (redacted by admin), and the reclassification of the street as pedestrian is going to vastly reduce the value of my property, and could potentially push myself and others into negative equity. This is completely unacceptable.</li> </ul> <p><b>Conclusion</b></p> <p>It is my belief that the points listed above highlight that the planned proposal for AB12 is unsound and that AB12 should be rejected by the planning inspector as a candidate for development.</p>

<b>Comment ID</b>	NULLP456
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Gomes
<b>Consultee Given Name</b>	Tamara
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>- Insufficient Noise Mitigation Protections: The draft Policy TC22 does not sufficiently address the potential conflict between the proposed residential development at Marsh Parade and The Rigger, a grassroots music venue that has been in operation for over 20 years. While the policy mentions a noise and odour assessment, it does not account for the specific risk of noise complaints from future residents, which could severely impact the venue's ability to operate. It lacks detail and does not provide any plans for robust noise mitigation strategies tailored to the risks posed by the close proximity of The Rigger to the new development. When the noise and odour assessment is carried out the Local Plan must ensure that any residential development near established cultural assets like The Rigger includes detailed, enforceable noise mitigation measures.</p> <p>- Failure to Incorporate the "Agent of Change" Principle: The draft Local Plan does not adequately reflect the "Agent of Change" principle, as outlined in the National Planning Policy Framework (NPPF). This principle stipulates that developers, rather than existing businesses, are responsible for mitigating noise issues when new residential developments are built near established venues. Without this principle being clearly applied, The Rigger faces an unfair risk of noise complaints, which could limit its ability to host live music events and threaten its role as a key cultural institution in Newcastle-under-Lyme.</p> <p>- Non-Compliance with the Duty to Co-operate: Lack of Consultation with the Venue: Despite ongoing efforts by The Rigger over the past 12 months requesting meetings to discuss mitigation, there has been no replies to these requests resulting in insufficient consultation with the venue. As a long-standing and critical part of Newcastle-under-Lyme's cultural and social ecosystem, The Rigger should have been included earlier in discussions to ensure the proposed development adequately addresses the venue's concerns. This lack of consultation raises concerns about whether the council has fulfilled its Duty to Cooperate obligations as part of the Local Plan process.</p> <p>- Legal Compliance: The Local Plan does not meet the legal requirements set out in the NPPF to protect and enhance cultural assets. The Rigger, a nationally recognised, award winning live music venue, contributes significantly to local culture and the economy. The absence of clear strategies in the Local Plan to safeguard The Rigger's future goes against the NPPF guidelines aimed at sustaining and enhancing cultural heritage. This oversight must be addressed to ensure venues like The Rigger continue to play their vital role in supporting the town's cultural identity and economy.</p>
<b>Q7 Modification</b>	<p>Explicit Reference to the Agent of Change Principle: The Local Plan must explicitly incorporate the "Agent of Change" principle, in line with the National Planning Policy Framework (NPPF), ensuring developers of the Marsh Parade site are fully responsible for mitigating noise impacts and issues when proposing residential developments near established cultural venues. This could include specific wording in Policy TC22 requiring that developers implement measures to prevent future noise complaints from residents, thereby protecting The Rigger from unfair restrictions or forced closure. Doing this would prevent the burden of addressing noise issues from being unfairly placed on The Rigger or any other existing cultural spaces and businesses in the local area. This would be to protect the already established venue from future noise complaints, ensuring its continued ability to operate without restrictive conditions.</p> <p>Incorporate Robust Noise Mitigation Measures: The Local Plan must include a clear requirement for detailed, enforceable noise mitigation strategies in any residential development proposal adjacent to established cultural venues like The Rigger. The existing reference to a noise and odour assessment is insufficient. This assessment should specifically mention The Rigger and address the unique risks posed by the close proximity of The Rigger and other similar venues and businesses, ensuring that comprehensive noise mitigation measures are implemented before any development is approved. This could include soundproofing requirements for new residential buildings or the creation of designated quiet zones within developments.</p> <p>Strengthening Noise Mitigation Requirements: The policy should include specific provisions that require a detailed noise impact assessment at the planning application stage, with particular attention to the impact on The Rigger. This should include:</p> <ul style="list-style-type: none"> <li>- Comprehensive soundproofing for all residential units within earshot of the venue.</li> <li>- A noise management plan, developed in consultation with the venue, which outlines measures to prevent potential conflicts between residents and the venue.</li> </ul> <p>Site-Specific Requirements to Protect The Rigger: The Local Plan must introduce site-specific requirements aimed at safeguarding The Rigger, given its significant role in the community. These provisions could include:</p>

	<ul style="list-style-type: none"> <li>- Acoustic barriers or buffers to physically reduce noise transmission from The Rigger to the new residential properties.</li> <li>- Setbacks or thoughtful placement of the residential units within the development to minimise sound exposure.</li> <li>- Building design elements, such as window positioning or the use of sound-absorbing materials, to further reduce noise-related issues.</li> </ul> <p>Amend Supporting Text to Acknowledge the Venue's Cultural Importance: The Local Plan's supporting text should highlight the significance of The Rigger as a cultural and economic asset to Newcastle. This would underscore the need for development proposals to take these assets into consideration when submitting applications.</p> <p>Strengthen the Protection of Cultural Assets: The Local Plan must include specific strategies aimed at safeguarding cultural assets, such as The Rigger, as required by the NPPF. This could involve designating these venues as protected sites or creating a framework for ongoing support and preservation, ensuring that the cultural and economic contributions of venues like The Rigger are preserved. The omission of these protections currently leaves the plan legally non-compliant with the NPPF's requirements to enhance and sustain cultural heritage</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>Protecting an Established Business and Cultural Asset: We are best positioned to provide detailed insights into how noise complaints or restrictions could impact our ability to continue operating as a live music venue, which has been a staple of the community for over 2 decades.</p> <p>Understanding of Potential Noise Conflicts: We have detailed knowledge of the operational needs of a live music venue and the types of sound mitigation measures that would be most effective in preventing noise conflicts with future residents. Without our input, the Local Plan may fail to adequately protect the venue from harmful noise complaints.</p> <p>Safeguarding Newcastle's Cultural and Economic Landscape: We are invested in the broader cultural and economic landscape of Newcastle, and we believe that our participation in the hearing sessions will help ensure that the Local Plan delivers balanced outcomes that protect both new residents and existing cultural assets.</p>



<b>Comment ID</b>	NULLP618
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<b>Policy PSD5 – Green Belt-</b> to deliver the housing targets, set out in the draft Local Plan, we recognize that, it will be necessary to develop some land in the Green Belt. The Branch accepts that there is insufficient 'brown field' land in the Newcastle-under-Lyme to meet the Borough's future development needs. We are not convinced, however, that Section 106 agreements as currently concluded with developers will achieve the 'compensatory improvements' referred to in paragraph 5.37 and believe that the draft Local Plan should make it clear that the Authority will insist on developers compensating the local community for the loss of Green Belt land.
<b>Q7 Modification</b>	<b>Modification of Policy PSD5</b> – the inclusion of a stronger statement to reflect the Borough Council's expectation that developers must compensate the local community for the loss of land in the Green Belt.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP622
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q6 Details</b>	<b>Policy CRE2– Renewable Energy</b> – The Branch welcomes the inclusion of this policy in the draft Local Plan and supports investment in Low and Zero Carbon technologies. We believe that it is possible to support the greater use of renewable energy and protect the heritage and character of a local area. Investment in solar and wind energy should also be encouraged. In view of the need to promote the use of renewable energy, the Branch feels that the obligation placed on major developments to provide at least 10% of their energy needs from renewable or low carbon sources may be too modest.
<b>Q7 Modification</b>	<b>Modification of Policy CRE2 Renewable Energy</b> - we would suggest that a higher percentage figure should be adopted. The obligation placed on developers of wind energy proposals to demonstrate that communities affected by schemes of this nature to support an application seems to be rather onerous and difficult to satisfy. It is unlikely that objectors to a particular scheme will concede that they have been persuaded by the case put forward by a developer.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP626
<b>Order</b>	50
<b>Title</b>	Policy HOU5: Specialist Needs Housing
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU5
<b>Q7 Modification</b>	<p><b>Policy Hou 5 – Specialist Housing Needs</b> – our modification to Policy Hou5 is set out below.</p> <p><b>Modification of Policy Hou 5</b> – the Branch suggests that Policy Hou 5 should be strengthened by amending paragraph 1a to make it clear that applications to build new care homes and other specialist accommodation will only be permitted if a developer can demonstrate that the new building is well connected to the public transport network and is close to key services, including healthcare, retail and other community facilities.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP630
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p><b>Policy IN1: Infrastructure</b> – we agree with the statement given in paragraph 10.3 that ‘good infrastructure planning is essential to achieving a high quality of development’ and welcome the adoption of an Infrastructure Development Plan (IDP), which will identify ‘the key infrastructure needed during the period of the Local Plan, how much this will cost and the expected source of funding’. We view the use of an IDP as a key feature of the new Local Plan. In this section it is argued that new development can result in the provision of better infrastructure. While we hope that new development will be accompanied by either new infrastructure or improvements to existing services and facilities, the condition of some of the infrastructure currently in place across Newcastle Borough is poor.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP634
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q6 Details</b>	<p><b>Policy SE1: Pollution and Amenity</b> – concern over air quality has resulted in parts of Wolstanton, Porthill and May Bank being designated as an Air Quality Management Area. We note that the draft Local Plan expects development proposals not to produce ‘significant adverse effects on public health, the environment or amenity from polluting emissions or odours’. We are of the opinion that this section should be strengthened and suggest that ‘significant’ should be deleted from the sentence. Residents across the Borough should enjoy clean air, and the emphasis placed by the Local Plan on encouraging development that is clean, and green is particularly welcome. We noted that this section referred to initiatives which could be adopted to improve air quality. Omitted from the list was the imposition of a Bus Gate along Basford Bank. We were encouraged by this omission, as we view a Bus Gate as a flawed and misguided response which will export traffic congestion and pollution to other parts of May Bank, Wolstanton and Porthill.</p>
<b>Q7 Modification</b>	<p><b>Modification of Policy SE1</b> – we believe that the draft Local Plan should confirm that the Borough Council expects development proposals not to have any adverse effects on public health, the environment or amenity.</p>
<b>Q9 Hearing reasons</b>	<b>Conclusion</b>

	Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP638
<b>Order</b>	119
<b>Title</b>	Policy SE10: Landscape
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE10
<b>Q6 Details</b>	<b>Policy SE7: Landscape</b> - we strongly agree with Policy SE7, particularly point 3, which alerts developers to the need to adopt styles and use materials which reflect and strengthen the local landscape.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP616
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<b>Policy PSD3- Distribution of Development</b> - While the Branch recognizes that some new build on Green Belt land will be necessary to meet the Borough's future housing needs, we believe before the Local Plan is adopted, the Borough Council should look again at the impact that new homes would have on the rural centres listed in the document. This exercise would establish whether the rural centres had the infrastructure to cope with an influx of new residents and identify the consequences development would have for the local countryside and wildlife.
<b>Q7 Modification</b>	<b>Modification of Policy PSD3</b> – the Council should review the impact new dwellings would have on the rural centres identified for further development with a view to establishing whether these centres had the infrastructure to cope with an influx of new residents and examine the consequences new development would have on the local countryside and wildlife.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP620
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q6 Details</b>	<b>Policy PSD6 – Health and Wellbeing</b> - – The Branch strongly supports this section and welcomes the emphasis the draft Plan places on health and wellbeing through access to sport, exercise and a healthy diet. We endorse the commitment given in the Plan to reducing obesity and endorse action to prevent the concentration of hot food takeaways (Policy RET3). We feel that greater use should be made of

	Health Impact Assessments in the scrutiny of development applications. The number of shops selling vapes in and around Newcastle Town centre cannot be overlooked and should be curbed. Single -use vapes cannot be recycled and represent a threat to health. We take the view that the draft Local Plan should recognize the adverse environmental and health effects of single-use vapes.
<b>Q7 Modification</b>	<b>Modification of Policy PSD6</b> – highlight the greater use of Health Impact Assessments in the scrutiny of development applications. Refer in the draft Plan to the need to curb the number of shops in Newcastle Town centre selling vapes.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP624
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	<b>Policy Hou2: Housing Mix, Density and Standards</b> – we have reservations about Policy Hou2, which can be summarized as follows: the different densities given in paragraph 1 for new dwellings in the urban and rural centres could encourage developers to focus on three and four bedroom homes in rural locations, while sites in the urban centre could become even more crowded. The density formula set out under Policy Hou2 could work against balanced and diverse new housing across the Borough. We are not convinced that steer given in Policy Hou2 will result in a level of housing density that will 'enhance the character and quality of a local area'.
<b>Q7 Modification</b>	<b>Policy Hou2 -</b> The Local Plan must reassure residents that more housing per hectare will not produce poorly designed, inferior homes, which rather than bringing people together will result in more noise, more disturbance, additional traffic, parking problems and erode privacy.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP628
<b>Order</b>	74
<b>Title</b>	Policy RET1: Retail
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET1
<b>Q6 Details</b>	<b>Policy RE1: Retail</b> – we were surprised that there was no reference in the draft Local Plan or Policy RE1 to the Wolstanton Retail Park and we would ask the Borough Council to explain how the Plan would relate to changes to the Retail Park, including the alteration of existing units and the construction of new shops. It is also surprising that the draft Plan does not refer to the need to improve the current access to Wolstanton Retail Park as this is an important reason why some residents prefer not to shop at the Park
<b>Q7 Modification</b>	<b>Modification of Policy RE1</b> – The Authority should rectify the omission of the Wolstanton Retail Park and include a reference to improving the access to the Retail Park which would, in our opinion, strengthen the Local Plan.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.

<b>Comment ID</b>	NULLP632
<b>Order</b>	90
<b>Title</b>	Policy IN3 Access and Parking
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN3
<b>Q7 Modification</b>	<p><b>Policy IN3- Access and Parking</b> – please see below for the modification proposed by the Branch to Policy IN3.</p> <p><b>Modification of Policy IN3</b> – we were surprised that there was no reference in this section of the draft Plan to the inclusion in development proposals of private or unadopted roads. The Branch suggests that the draft Plan contains a statement to the effect that the practice of including private or unadopted roads in development applications will be discouraged by the Borough Council as roads of this nature can cause some inconvenience to residents once a development has been completed.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP636
<b>Order</b>	115
<b>Title</b>	Policy SE8: Biodiversity and Geodiversity
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE8
<b>Q6 Details</b>	<p><b>Policy SE5:</b> Biodiversity and Geodiversity – the only comment we would make under this policy is to question the qualification to the statement in point 6. Surely any development which would result in the loss or deterioration of irreplaceable habitats should be refuse. If a habitat is irreplaceable, a compensation strategy would be little recompense.</p>
<b>Q7 Modification</b>	<p><b>Modification of Policy SE5</b> – amend the draft Plan to make it clear that any development proposal which involved the loss of irreplaceable habitats would be refused.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP640
<b>Order</b>	156
<b>Title</b>	BW1 Chatterley Valley, Lowlands Road
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BW1
<b>Q6 Details</b>	<p><b>Policy BW1, Chatterley Valley</b> – we were surprised that the draft Local Plan did not give greater prominence to Chatterley Valley as a strategic employment site. This lack of recognition is surprising given the considerable public investment that has taken place. This site is located close to key highways (M6, A500) and situated not far from rail lines which serve the Midlands and the North West. As Chatterley Valley has a good deal of brownfield land, investment in this site would contribute to regeneration and has the potential to attract firms specializing in green technology. Developing a brownfield site such as Chatterley Valley may allow more land within the Green Belt to be preserved.</p>

<b>Q7 Modification</b>	<b>Modify Policy BW1</b> – give greater prominence to the Chatterley Valley site as a centre for future technological and manufacturing enterprise.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP617
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<b>Policy PSD4 - Development Boundaries and the Open Countryside</b> - we strongly support the re-use of previously developed land and buildings and feel that the reclamation of both land and buildings should feature strongly in the Local Plan. We must, however, repeat the concern which was expressed during the Regulation 18 stage of the Local Plan that the commitment to review village envelope boundaries could result in changes which made it easier to build within village envelopes.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP621
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<b>Policy CRE1 – Climate Change</b> -The Branch strongly supports this section of the draft Plan and agrees that all new and existing developments should contribute to the reduction in greenhouse gas emissions. We recognise that action is needed to promote the efficient use of energy and feel that an energy/sustainability statement should be included in a development application. We welcome paragraph 6 which makes it clear that: <i>Developments should use appropriate design, construction, insulation, layout and orientation to create developments that are resilient to climate change, minimise energy use, use natural resources prudently, and promote the use, recovery and recycling of materials to reduce embodied carbon.</i> We look forward to an extended district heat network at Keele and believe that the Local Plan should oblige developers to consider this option before other heat sources were considered. We think it entirely reasonable to expect development proposals to include green spaces and tree planting and believe the cost of maintaining green spaces and trees should be carried by the developer. While we accepted that water should be conserved and agree that residential development proposals should try to reduce the use of mains water, we suggest that the authorities need to do more to reassure the public that readings provided by smart meters are accurate.
<b>Q7 Modification</b>	<b>Modification of Policy CRE1</b> – modify as follows: a) oblige developers to consider the district heat network based at Keele before other heat sources were considered; b) cost of maintaining green spaces should be carried by developers.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP625
<b>Order</b>	46



<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q6 Details</b>	<b>Policy Hou 3</b> – Housing Standards – the Branch welcomes the recognition given in paragraph 7.24 that the physical accessibility of housing should not be viewed solely as a concern of the elderly and is relevant across the age range and may also apply to residents with young families or have specific needs.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP629
<b>Order</b>	79
<b>Title</b>	Policy RET3: Restaurants, Cafes, Pubs and Hot Food Takeaways
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET3
<b>Q6 Details</b>	<b>Policy RET3 – Restaurants, Cafes, Pubs and Hot Food Takeaways</b> – the restrictions set out in paragraph 3 concerning the proximity of hot food takeaways to schools and their hours of trade should be welcomed. The Branch also endorses the commitment given in the Plan to curbing the growth of hot food takeaways in parts of Newcastle. We are delighted to note the stress placed by this section of the draft Plan on health awareness and promotion.
<b>Q7 Modification</b>	<b>Modification of Policy RET3</b> – whilst the draft Plan requires new proposals for hot food takeaways to undertake a health impact assessment (HIA), we believe that any proposal which is shown by a HIA to have an adverse impact on health and wellbeing should be refused.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP633
<b>Order</b>	92
<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN4
<b>Q6 Details</b>	<b>Policy IN4 – Cycleways, Bridleways and Public Rights of Way</b> – this section of the draft Plan is sound and deserves to be adopted. We believe that development proposals should improve the opportunities residents have to walk, cycle and ride, particularly in those parts of the Borough where access is limited.
<b>Q7 Modification</b>	<b>Modification of Policy IN4</b> - we take the view that paragraph 1c gives considerable leeway to developers and therefore suggest that 'normally' is deleted from the sentence, which should <b>read; development will not be allowed to lead to the closure of a public right of way unless a suitable replacement can be established</b> . To promote the safety of cyclists and walkers, we suggest that cycle and walkways should connect with the main pedestrian crossing points. There are examples in the Borough of walk and cycle ways which require cyclists and pedestrians to cross busy main roads. The mineral line through Knutton is an example of a walk and cycle way which is split between a busy road with the result that cyclists and walkers have to contend with traffic using Lower Milehouse.

<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP637
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q6 Details</b>	<b>Policy SE6: Historic Environment</b> – we question the wording of points e & f of paragraph 1. In view of the loss of buildings of note and interest in the past due to redevelopment, the Branch does not believe that there are any exceptional circumstances which would justify substantial harm to, or loss of, Grade II listed buildings or Grade II registered parks and gardens.
<b>Q7 Modification</b>	<b>Modification of Policy SE6</b> – amend the draft Plan to make it clear that there are no exceptional circumstances which would allow a development proposal to be approved that involves substantial harm to, or the loss of Grade II listed buildings or Grade II registered parks and gardens.
<b>Q9 Hearing reasons</b>	<b>Conclusion</b> Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.
<b>Comment ID</b>	NULLP615
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to take part in the consultation exercise on the draft Local Plan launched by the Newcastle-under-Lyme Borough Council. The Branch Party currently has 130 members spread across the Cross Heath, Wolstanton and May Bank wards. The Branch supports the work of 4 Borough councillors and many of our members are directly involved in residents' associations, community groups and a diverse range of local clubs and societies. Our response to the Local Plan reflects the Branch Party's conviction that future planning decisions across Newcastle-under-Lyme should be guided by a strong Local Plan. We believe the adoption of a Local Plan is essential to conserve green spaces and protect the Borough from unwelcome development. Our approach is to suggest ways in which the draft Plan could be strengthened rather than use the consultation exercise to highlight political differences. We are concerned, however, that the draft Plan appears to have been prepared with little or no consultation with Staffordshire County Council, Stoke-on-Trent City Council or local NHS agencies. This absence of involvement may impede the Plan's delivery, as the Borough Council relies on the County Council for the provision of infrastructure and access to doctors and dentists will be regulated by local NHS agencies. Infrastructure and access to medical services must be key elements in delivering the excellent new housing promised in the Plan. We suspect that the draft Plan has been prepared with little or no input by key partners of the Borough Council.</p> <p>We believe that Newcastle -under-Lyme must adopt a Local Plan which recognizes the need for a range of new dwellings across the Borough. We want to see well-designed, energy efficient new homes which cater for the housing needs of existing residents and people who may wish to relocate to Newcastle-under-Lyme. The Local Plan should impress upon developers the importance of including flats, bungalows, two-bedroom houses, together with sheltered and assisted living accommodation in future applications for development. One concern we have over the sites suggested for development in the draft Plan is that these locations are likely to prompt planning applications which focus on the construction of three or four bedroom 'executive' houses located on the outskirts of the Borough, some distance from either the main places of work or essential amenities.</p>

	<p>While there is certain to be a demand for family homes, it is important that the housing needs of other groups are addressed, particularly the elderly and people under the age of 40, many of whom struggle to find decent, affordable housing. While we welcome the support given in the draft Plan to</p> <p>the inclusion of affordable housing in development applications, we believe that dwellings designated as 'affordable' family homes would still be beyond the income of many Newcastle residents. In our view the most effective way of providing affordable homes is by building social housing.</p> <p>Under the current planning system developers secure Section 106 agreements with the Borough Council which stipulate the number of affordable homes that should be provided. It is often the case that once Section 106 has been agreed, a developer will apply for it to be lifted by arguing that the agreement now makes the development less financially viable. We would ask the authors of the Local Plan to consider how Section 106 agreements should be enforced in future and what measures should be in place to discourage developers from not fulfilling commitments agreed with the Borough Council.</p> <p>We recognize that new homes will be needed in Newcastle and accept that as the Borough has few, if any brownfield sites available for redevelopment, some new build will have to take place on the Green Belt. We would question whether the forecast given in the draft Local Plan takes sufficient account of the emphasis now placed by ministers on the conversion of derelict and empty buildings into living accommodation. Providing good standards of design are observed and quality materials used, we think this approach has merit and may be a faster and more sustainable way of providing accommodation than demolishing an existing building and then clearing the site.</p> <p>The Branch believes that the soundness of the draft Plan would be strengthened if the Borough Council provided evidence that the key objectives and commitments set out in the Plan were shared by the Council's partners.</p> <p>The Regulation 19 stage of the draft Plan cites a housing need of 400 dwellings pa and assumes that this figure will be accompanied by a substantial growth in employment across the Borough. The Branch is not convinced that an increase in house building will coincide with a comparable increase in jobs. Therefore, we must question whether the draft Plan is sustainable.</p>
<b>Q7 Modification</b>	<p>The Branch believes that the soundness of the draft Plan would be strengthened if the Borough Council provided evidence that the key objectives and commitments set out in the Plan were shared by the Council's partners.</p> <p>Whilst the commitment in the Plan to affordable housing is welcome, we believe that the document should make it clear that for the purposes of the Local Plan, affordable housing means rents and charges which reflect income levels in Newcastle -under-Lyme.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP619
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	<p><b>Policy PSD7-Design</b> – We strongly agree with the statement that any new development should contribute positively to an area's character and identity. We also welcome the stress the draft Plan places on using design to reduce the risk of crime. The Branch believes, however, that the statement in paragraph 5.45 would be strengthened if 'should' was replaced by 'must' and therefore read as follows: <i>Developers should engage with the Council, the local community and relevant statutory consultees at the earliest opportunity to make sure the development appropriately responds to the unique character and sense of place in the Borough.</i></p>
<b>Q7 Modification</b>	<b>Modification of Policy PSD7</b> – amended to paragraph 5.45 as proposed above.
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP623
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party

<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p><b>Policy Hou1– Affordable Housing</b> - our support for the construction of affordable housing was set out in our response to Policy PSD1. We believe that Policy Hou1 highlights the demand for affordable housing across Newcastle-under-Lyme and provides convincing reasons why affordable housing must be encouraged by a new Local Plan. We recognise that to satisfy the demand for affordable housing, new homes must be built. One flaw of the Regulation 19 draft Plan is that it</p> <p>does not include specific targets for the construction of affordable or social housing. The absence of targets leads the Branch to doubt whether the intention of the Plan to deliver additional affordable and social housing will be achieved.</p> <p>In areas such as Newcastle-under-Lyme wage levels have failed to keep pace with market rents. While the Regulation 19 draft Plan stipulates that between 15% - 30% of new dwellings must be affordable, the Branch is sceptical that this target will be achieved. It is our experience that developers have often argued that increasing construction costs should release them from any affordable or social housing contributions previously negotiated under Section 106 agreements.</p>
<b>Q7 Modification</b>	<p><b>Policy Hou1</b> -We note that the Policy Hou1 allows some flexibility concerning the obligation on developers to provide off-site affordable provision. The document refers to 'exceptional circumstance'. We feel that this section should provide examples of exceptional circumstances which the Borough Council consider valid. In general, the Branch believes that Policy Hou1 should express more vigorously the Borough Council's expectation that Section 106 agreed between the Authority and developers should be observed.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP627
<b>Order</b>	67
<b>Title</b>	Policy EMP1: Employment
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP1
<b>Q6 Details</b>	<p><b>Policy EMP1: Employment</b> – we accept that identifying sites for industrial or commercial development is essential for the Borough's future prosperity and agree that a mix of sites, differing in size and location, should feature in the Local Plan. The suggestion as set out in the Regulation 18 version of the draft Local Plan that new strategic employment sites should avoid a piecemeal or an ad hoc approach to development by adopting a masterplan is our view well worth pursuing. We agree that the Borough Council should vet a masterplan before work begins on site. The Branch takes the view that many Borough residents will welcome the reference in paragraph 8.3 to overnight lorry parks as lorries left stationary during the night can become a nuisance. Under site allocations, the Branch will comment on the low priority given in the Plan to Chatterley Valley.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP631
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2

<b>Q6 Details</b>	<p><b>Policy IN2: Transport and Accessibility</b> – while we welcome the stress placed throughout the draft Plan on the importance of using public transport to connect people to their homes, places of work, schools, colleges, shops and leisure and entertainment venues, we feel that the document does not pay sufficient attention to the challenge of using public transport, particularly buses, when operators have axed routes and reduced the frequency of many services. We note that some of the sites in rural areas which have been provisionally identified for development are poorly served by public transport.</p> <p>Apart from a reference a 'link road between A525 Keele Road and Whitmore Road' and improvements to Talke Signals (A38 Newcastle Road/ Congleton Road/ Coalpit Hill), the draft Local Plan fails to identify major improvements to the road network which will be needed to deliver the connectivity and prosperity the Plan is supposed to underpin. Branch members were disappointed that at Regulation 19 stage there was no reference in the Local Plan to improving access to M6 at Junctions 15 and 16.</p> <p>Under the accessibility heading, we understand that there have been examples of developers following approval of planning applications, approaching the Borough Council to secure a reduction in the number of car spaces reserved for drivers with disabilities. We believe this to be a thoroughly bad practice and would ask the Borough Council to include a statement in the draft Plan which would discourage developers from putting forward applications of this kind.</p>
<b>Q7 Modification</b>	<p><b>Modification of Policy IN2</b> – The Branch believes that the draft Local Plan would be strengthened if it included a detailed and costed integrated transport plan which addressed the current problems faced by residents when trying to access public transport (cuts to routes and decreased frequency) and explained how an integrated transport plan would support both housing growth and economic development.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP635
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE4
<b>Q6 Details</b>	<p><b>Policy SE4: Open Space, Sports, and Leisure Provision</b> – we welcome that statement that the Borough Council will work with developers and other stakeholders to provide, enhance, and maintain open spaces across the Borough. The Branch believes that the adoption of a Local Plan is one of the most effective ways to protect open space from housing and other development.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>
<b>Comment ID</b>	NULLP639
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Company / Organisation</b>	Cross Heath, Wolstanton and May Bank Branch Labour Party
<b>Consultee Position</b>	Branch Secretary
<b>Consultee Family Name</b>	Gorton
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p><b>Policy KL13, Keele Science Park</b> - Keele University is an internationally recognized centre for research and scholarship. It is also seen as a pioneer in the development of green energy and green technology. Within the Borough the University is one of the main employers and its contribution to the local economy is substantial. If the University is to continue to grow, it should have access to development space.</p>
<b>Q9 Hearing reasons</b>	<p><b>Conclusion</b></p> <p>Cross Heath, Wolstanton and May Bank Branch Labour Party welcomes the opportunity to give its views in response to the Regulation 19 stage of the draft Local Plan. If it is felt to be appropriate, a member of the Branch would be prepared to take part in the public scrutiny of the draft Local Plan.</p>

<b>Comment ID</b>	NULLP1202
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1184
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Comment ID</b>	NULLP1188
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	Dear Inspector,



Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.

However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.

Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.

The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.

These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.

Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.

All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .

I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.

I would like to mention two sites in particular , which are AB2 and CT1.

AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.

Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.

Residents constantly complain about traffic and noise , plus air quality.

When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .

Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .

AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.

CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.

Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.

<b>Comment ID</b>	NULLP1181
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p>

	<p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1186
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Comment ID</b>	NULLP1191
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Comment ID</b>	NULLP1195
<b>Order</b>	214
<b>Title</b>	Policy BL8 Land adjacent to roundabout at West Avenue, Kidsgrove
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL8
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p>

	<p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1200
<b>Order</b>	220
<b>Title</b>	Policy TK6 Site at Coalpit Hill Talke
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK6
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1183
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	Dear Inspector,

	<p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1192
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Comment ID</b>	NULLP1196
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p>

	<p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1201
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1185

<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p> <p>Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.</p>
<b>Comment ID</b>	NULLP1194
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p>



Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.

All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .

I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.

I would like to mention two sites in particular , which are AB2 and CT1.

AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.

Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.

Residents constantly complain about traffic and noise , plus air quality.

When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .

Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .

AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.

CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.

Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.

<b>Comment ID</b>	NULLP1199
<b>Order</b>	218
<b>Title</b>	Policy BL32 Land at Congleton Road, Butt Lane
<b>Consultee Family Name</b>	Grocott
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL32
<b>Q6 Details</b>	<p>Dear Inspector,</p> <p>Newcastle Under Lyme needs a local plan, to allow structured development of housing across the Borough and secure sites that are in green belt land.</p> <p>However, I feel that the local plan we see being put forward has sites in , that are not just unpopular but also have real infrastructure concerns and based on assumptions that I feel cannot be substantiated.</p> <p>Having attended various resident group meetings , I have found that they are very knowledgeable and who knows better than local residents , the problems that they face now and how the new developments will affect them and not against a local plan but sites that are in the plan.</p> <p>The main sites that I have concern over AB2, AB33,AB12,AB15, CT1, BL8,BL18,BL32, TK6,Tk17 and TK27.</p> <p>These are in Audley , Red Street and Butt Lane /Talke , areas that I have links with and know well.</p> <p>Documents are now accessible, but residents and councillors have by timings of release , which in some cases have not allowed proper time for scrutiny and meaningful consultation.</p> <p>All these sites have traffic issues already and note recommendations regarding A500 , Talke Interchange, A34 ,A527 , which will need major financial assistance .</p> <p>I believe all the sites listed have questions about infrastructure and would question how sound the reasoning and financial constraints of the projects to be deliverable.</p> <p>I would like to mention two sites in particular , which are AB2 and CT1.</p> <p>AB2 is a 80-hectare project for warehousing /factory that is not in keeping with the rural area , with only 22 hectares needed for warehouse , the rest is for lorry car park and substation.</p> <p>Having experienced problems in my Ward , Holditch and Chesterton , with warehouse now occupied by Boughey Distribution I believe this is not a sound proposal.</p> <p>Residents constantly complain about traffic and noise , plus air quality.</p> <p>When it was built people complained , before it was even occupied residents about construction, and we also had problems concerning getting Road adopted by Staffordshire County Council .</p> <p>Without this happening , warehouse contract would not have been signed , and quite possibly would still be empty now .</p> <p>AB2 in Audley , is potentially 3 times bigger than Chesterton warehouse , and have grave reservations regarding the soundness of this development plus I believe that there may be another more appropriate alternative.</p> <p>CT1 Red Street has been scaled down but worth noting , that area has a history of being used for mining , as well as this mentioned in the report doctors which closed and now a dentist.</p>

Due to the problems with documentation being available for consultation , and real reservations about infrastructure and financial viability , I would ask you to consider if this plan is sound and complaint.

<b>Comment ID</b>	NULLP159
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Family Name</b>	Guest
<b>Consultee Given Name</b>	Maureen
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Map 1 Audley Ward</p> <p>Not legally compliant, Is unsound, Fails to comply with duty to co-operate.</p> <p>I believe the amount of new build houses in and around Audley will completely spoil this village. The roads already cannot take the amount of traffic passing through and around the village. Also the building of a huge warehouse which I understand no company or business has requested be built will bring unwanted traffic and unwanted vans/lorries passing through the village. These buildings will bring chaos to already burdened roads. The little roundabout coming in to the village has required several re-tarmac work in the four years I have lived here. These buildings will stop the use of the local lanes for all users such as runners/walkers/dog walker/horse riders and will also spoil the local wildlife by bringing vehicles and exhaust fumes to the countryside. I object to all the planned buildings.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1469
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hackett
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1470
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hackett
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed</p>

leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of

	<p>the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Only one school</p> <p>Not enough doctors to take the amount of people expected</p> <p>Wildlife disruption</p> <p>Road congestion</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1475
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hackett
<b>Consultee Given Name</b>	Jennifer
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1477
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hackett
<b>Consultee Given Name</b>	Jennifer
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Not enough schools</p> <p>Not enough doctors</p> <p>Road congestion</p> <p>Wild life disruption</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP359
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hackforth
<b>Consultee Given Name</b>	James
<b>Agent Family Name</b>	Hackforth
<b>Agent Given Name</b>	James
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The site AB2 is unsound - the site is on J16 of the M6 which is already a congested part of the road network. The A500 is frequently congested at peak times and whenever there is an incident on the M6. This also affects surrounding local roads through Audley. This junction cannot accommodate the extra traffic that would be generated by the massive industrial site. The emergency access that is planned for Barthomley Road is both unsound and unjustified. The road is a narrow and windy country lane used by many local residents as a rural walk. The dangerous conditions and damage to the countryside and wellbeing of nature and residents that an increase of traffic including heavy goods and service vehicles cannot be justified.</p> <p>The employment site is said to create thousands of jobs. Jobs in this type of warehousing facility are likely to be replaced by AI and robots in the coming years, therefore the statement that it will create this amount of jobs is also unsound and the irreversible damage this will do to the greenbelt for a short term investment in jobs cannot be justified. The jobs that are created in the short term will create thousands more cars travelling to the site as there are no public transport links. Personal car use will be the only viable way for workers to access the site.</p> <p>The site cannot be justified as the proposal is to remove 80 HA of good quality greenfield for 22HA of employment land. The site is unsound as it is four times larger than the council say that they need. This will lead to the employment / housing ratio becoming unbalanced and this rural community will be faced with more housing development that the infrastructure of the village cannot cope with. There will not be capacity for traffic, schools, health centres and dentists.</p> <p>This site is cannot be justified as there are already huge warehouse facilities a very short distance away in Alsager. These warehouses are largely empty. There is also the development at Radway Green. Whilst not in the Newcastle Borough, these industrial areas should be considered in conjunction with the local plan.</p> <p>The plans state that the height, scale and form of the development should reflect the character of the area. This excessively enormous industrial site cannot possibly be deemed to fit the character of this greenbelt rural land. The land is high quality agricultural land that can never be replaced. It supports wildlife and at a time when the world is in a climate crisis, the council should be protecting this land from excessive development. For these reasons, this site is unsound and unjustified.</p>
<b>Q7 Modification</b>	To make this local plan sound, the AB2 site should be removed from the plan as there are alternative sites that are more appropriate for the aims of the council. The size of the site, the irrecoverable damage it will do to the environment and nature , the increase in HGVs and cars that will congest both the A500, M6 and local roads cannot be justified and makes the plan dangerous, unjustified and unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP356
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hackforth
<b>Consultee Given Name</b>	Katy
<b>Agent Family Name</b>	Hackforth
<b>Agent Given Name</b>	Katy
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.12
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The site AB2 is unsound - the site is on J16 of the M6 which is already a congested part of the road network. The A500 is frequently congested at peak times and whenever there is an incident on the M6. This also affects surrounding local roads through Audley. This junction cannot accommodate the extra traffic that would be generated by the massive industrial site. The emergency access that is planned for Barthomley Road is both unsound and unjustified. The road is a narrow and windy country lane used by many local residents for recreation including walking, cycling and horseriding. The dangerous conditions and damage to the countryside and wellbeing of nature and residents that an increase of traffic including heavy goods and service vehicles cannot be justified.</p> <p>The employment site is said to create thousands of jobs. Jobs in this type of warehousing facility are likely to be replaced by AI and robots in the coming years, therefore the statement that it will create this amount of jobs is also unsound and the irreversible damage this will do to the greenbelt for a short term investment in jobs cannot be justified. The jobs that are created in the short term will create thousands more cars travelling to the site as there are no public transport links. Personal car use will be the only viable way for workers to access the site.</p> <p>The site cannot be justified as the proposal is to remove 80 HA of good quality greenfield for 22HA of employment land. The site is unsound as it is four times larger than the council say that they need. This will lead to the employment / housing ratio becoming unbalanced and this rural community will be faced with more housing development than the infrastructure of the village can cope with. There will not be capacity for traffic, schools, health centres and dentists.</p> <p>This site is cannot be justified as there are already huge warehouse facilities a very short distance away in Alsager. These warehouses are largely empty. There is also the development at Radway Green. Whilst not in the Newcastle Borough, these industrial areas should be considered in conjunction with the local plan.</p> <p>The plans state that the height, scale and form of the development should reflect the character of the area. This excessively enormous industrial site cannot possibly be deemed to fit the character of this greenbelt rural land. The land is high quality agricultural land that can never be replaced. It supports wildlife and at a time when the world is in a climate crisis, the council should be protecting this land from excessive development. For these reasons, this site is unsound and unjustified.</p>
<b>Q7 Modification</b>	To make this local plan sound, the AB2 site should be removed from the plan as there are alternative sites that are more appropriate for the aims of the council. The size of the site, the irrecoverable damage it will do to the environment and nature , the increase in HGVs and cars that will congest both the A500, M6 and local roads cannot be justified and makes the plan dangerous, unjustified and unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP194
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hall
<b>Consultee Given Name</b>	Clair
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP235
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hall
<b>Consultee Given Name</b>	Clair
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP182
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hall
<b>Consultee Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP222
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hall
<b>Consultee Given Name</b>	Dave
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP1397
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Halliday
<b>Consultee Given Name</b>	Margaret
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1461
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Halliday
<b>Consultee Given Name</b>	Margaret
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

Comment ID	NULLP1252
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Halsall
Consultee Given Name	Colin
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Policy AB2 'Land at Junction 16 of the M6'</b></p> <p>The site extends to circa 80 hectares and is allocated for uses including 22 hectares (circa 220,000 sqm of floorspace) of employment land. Removing 80 ha of land from the green belt for 22 ha of employment land cannot be justified.</p> <p>There are alternative sites within the Borough and surrounding area as can be evidenced from the table below which was produced late September 2024. All of these units are within a 10 mile radius of Audley. We are aware Chatterley Valley has been incorporated into the employment land provision but Radway Green should be seriously considered as a viable alternative to AB2. <i>(table available in attachment)</i></p> <p><b>2. Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 with emergency access via Barthomley Road, both to be delivered in Phase 1 of the development.</b> The developer St. Modwen Developments Limited, produced a report in January 2022 on 'Comments on Strategic Employment Land /ssues' to Newcastle Under Lyme Council and employed the services of PJA based in Birmingham for their professional analysis. We have extracted comments which are relevant to the potential emergency access issues.</p> <p>2.3.2 Park Lane and Moat Lane at the southern boundary of the site are minor rural lanes listed as advisory cycle routes in SCC's cycle maps. As indicated in Figure 2.2 the advisory routes continue to the east through Audley and Bignall End and to the west through Barthomley.</p> <p>3.4.1 In addition to the vehicular access from A16 J16, <b>two emergency vehicle access points would be provided from Park Lane and Moat Lane on the eastern and southern boundaries of the site respectively. Whilst these are not required from a policy or operational point of view, it is considered prudent to retain alternative temporary access arrangement</b>, in the unlikely event that the primary access be wholly blocked and an emergency occurs on site, which necessitates access for the emergency services.</p> <p>6.1.5 Park Lane/Moat Lane - A 'quiet lane' treatment, offering improved surfacing and signage to encourage cycle usage along a very lightly trafficked route.</p> <p><b>Please Note:</b> At some point between this report being submitted and the final draft Local Plan the emergency access route has been changed from <b>Moat Lane to Barthomley Road</b> without any explanation.</p> <p>The issues of concern to us with this emergency access are that:</p> <ol style="list-style-type: none"> <li>1. Given the highlighted section above as provided to NUL by St Modwen's the emergency accesses are not required from a policy or operational point of view yet it seems that two are still required.</li> <li>2. All local roads leading to the access are minor/quiet rural lanes listed as advisory cycle routes, they also are used recreationally for horse riding, dog walking, and both Audley Striders Walking and Running Club use these lanes regularly.</li> <li>3. Barthomley Road emergency access is to be developed in Phase 1, this leads to really worrying concerns as the main access to AB2 from the A500 will take a considerable length of time to build, yet the local access will not require the same level of development so it will become the likely first access into the site. Will this mean that all the heavy machinery will be using this access as it will seem incredible if the developer waits until the main access is available and lose precious time and money in the process.</li> <li>4. How is the access going to be managed so it is not misused? There has not been anything documented as to how it will be implemented. Any delays or blockages on the A500 could send vehicles to use this access as an alternative route.</li> <li>5. The lanes are single track with a few passing places and there are some blind bends. Locals on Barthomley Road have limited access to their driveways and visibility is poor for some of them.</li> </ol> <p><i>(Diagram available in attachment)</i></p> <p><b>3. Provision for secure, high quality Heavy Goods Vehicle lorry parking with ancillary welfare and amenity facilities of an appropriate scale to serve the site. The management and operation arrangements for the lorry park provision to be agreed with National Highways in consultation with Staffordshire County Council</b></p> <p><b>13.13 The allocation of the site would result in a loss of a lay-by by the A500. Consequently, secure and high-quality HGV parking should be provided as a replacement on the site. This should include an element of free short stay parking for all HGV vehicles agreed following appropriate engagement with Staffordshire County Council and National Highways.</b></p> <p><u>Newcastle-under-Lyme Strategic Employment Site Assessment Report (2024) Evidence Base</u></p> <p><u>4 Review of Local Plan 2020 - 2040 Public Consultation</u></p> <p>4.16 This includes a 200-space lorry park to take vehicles off the A500. This is supported by the Road Haulage Association</p> <p>Currently the A500 has the capacity in its lay-by's to cater for approximately 20 HGV lorries. If the lorry park goes ahead then this will increase the flow of HGV's ten fold and the only thing it will have achieved is to create an extra traffic lane where the lay-by once stood and encourage lots more lorries to come to Audley via the A500. This will have a knock-on effect of increasing air pollution, noise pollution and adding more traffic to an already very busy road. There are two service stations either side of Junction</p>

16 in a North and South direction. Keele is less than 9 miles away and Sandbach is 8 miles away Both have free short stay parking for HGV vehicles.

**13. Implementation of an agreed comprehensive travel plan incorporating measures to support travel to / from the development, particularly by sustainable modes. This should implement initiatives to support sustainable travel into the site, to include cycle links into the development with suitable cycle parking / amenities, bus routes and demand responsive travel schemes to support workers travelling to / from the site. The Travel Plan should consider routes connecting into Newcastle-under-Lyme, Stoke-on-Trent and Cheshire East**

Supporting Information

**13.14 A comprehensive travel plan will be required for the site. The travel plan should consider bus / demand services on the site to cater for shift patterns. The travel plan should establish targets, linked to the outcomes of a transport assessment and monitored via traffic counts and surveys. The travel plan should also consider initiatives including charging for car parking on site to fund, through revenue raised, bus services in the medium to longer term.**

. **Extracts from the Strategic Transport Assessment:** 4.6 Site AB2 is located on a dual carriageway with currently no footpath or nearby bus stop, therefore, no public transport was accessible within the catchment times. It should be noted that the developer has indicated that, following conversations with local bus operators and Staffordshire County Council, the development of this site would include a funded bus route to improve the public transport provision to the area and the site.

4.6.2 Site AB2 has poor accessibility scores for both walking and cycling.

**Extract from Newcastle-under-Lyme Borough Issues and Strategic Options Paper (2021):**

Issues:

. The workforce is not within immediate proximity, and the site is removed from current public transport routes and local service centres, which could necessitate the creation of Sustainable Travel Plans.

. The loss or potential moving of a lay-by to enable access to the site could be problematic indicating potential issues with site access and traffic flow.

. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area.

. The site's strategic location on the M6 provides good accessibility to a large proportion of the UK's population and key markets, but this also means that the impact on the transport network needs careful consideration.

8.6.1.1 Model Identified Mitigations

The final selection of mitigation measures is as follows, . AB2 - Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour.

9.1 Summary

Accessibility Data Analysis

. All strategic sites show an accessibility extent that is focussed towards The Potteries

. MG Junction 16 site has poor public transport connectivity

Existing traffic conditions on the strategic road network: . M16 J16 - Observed data shows traffic congestion along the 4500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM),

**Newcastle-under-Lyme Strategic Employment Site Assessment Report (2023) Evidence Base**

2. Land at J16 of the M6 (ref: AB2): There is a lack of public transport serving the site, which could limit access for employees without private vehicles. Amenities and Workforce: The site's location, while excellent for logistics due to proximity to the M6, may lack local amenities and have issues related to the availability of local workforce. Mitigation Measures: The developer, St Modwen Developments, is working on mitigation measures for the identified transport issues, including improving access to the business park.

**Appendix B - Steering Group Minutes**

**Subject of meeting: Newcastle-under-Lyme Local Plan - Strategic Transport Assessment**

AB2: ' PG: Concerned about baseline public transport access . PT Agreed. Needs access by sustainable means. . PG: **Where developers agree to fund an enhanced bus service, there is a risk of it being discontinued once the funding period concludes leaving a site with no public transport access . JK: Mitigation is needed for J16 sites. We need to understand how the buses will operate outside of working hours. Operators need to be willing to run those and understand what they are going to do with the vehicles for the rest of the day.**

To summarise it is clear access issues are the prevalent theme given the location in such close proximity to the M6 and the potential to cause traffic delays at Junction 16 and the A500. Lack of public transport and other means of accessing the site apart from vehicles. It has been reported that AB2 could create up to 3000 jobs, although the figure has not been substantiated. Given that only buses could provide a public service to the site (no nearby rail station), would they invest in creating a new bus route until a demand has been identified? What about shift workers, would they provide a night time service? Would employees be happy to pay car parking charges at their place of work so the bus provision can be subsidised which has been suggested and noted In this report? What about the points raised above at the Steering Group meeting highlighted in bold.

Another issue has to be the increase in traffic if AB2 is built. Currently the local "Protect Audley Parish Greenbelt" group are carrying out traffic surveys on the A500 and roads leading into the village as during peak times u/e see a massive increase in road users. These figures will be made available in their submission to the Planning Inspector but we know from being local how busy the roads are even though they are 'B' roads. With the impending building of new housing in Audley as well the village will not be able to cope. The infrastructure is already at breaking point with schools, dentists, doctors etc and there has been no mitigation for improvement that we are aware of in Audley. Audley a/so has a higher rate

	<p>than the national average of breathing ailments and the increase in air pollution from CO2 and tyre particulate pollution as well as noise pollution.</p> <p><b>IN CONCLUSION</b></p> <ul style="list-style-type: none"> <li>- There are other alternative sites to AB2 as listed in the chart on Pg 1 that could be considered as alternative employment land for 'Big Box' developments within a 10 mile radius of Audley.</li> <li>- A huge lorry park will only increase HGV's on the 4500, that is without consideration for the vehicles that will be employed by AB2. The 4500 at Audley is already a very busy network with regular hold-ups leading up to the motorway, not only at peak times.</li> <li>- The access to the site from the A500 will be a huge undertaking and disrupt traffic flows whilst under construction. It will likely impact the slip road off J16 on the MG and the roundabout.</li> <li>- Increase in vehicles in the area can only have a detrimental affect on people living in Audley, both for ease of access into the village and air and noise pollution and will certainly increase the carbon footprint.</li> <li>- Emergency accesses from Park Lane and Barthomley Road are likely to be used in the event of blockages on the A500. They might also be used by contractors to start work on the site with heavy machinery as there is every likelihood the A500 entrance will take a long time to complete. These are quiet country single track lanes not designed for large vehicles or an increase in traffic. Local people on Barthomley Road already have access issues. A recent planning application 'A824' for new housing on Barthomley Road was rejected because "Barthomley Road is a single lane and could present access issues to the southern dwellings". These lanes are used by local people for recreational purposes.</li> <li>- Accessibility to the site is poor in terms of public transport, cycling or walking.</li> <li>- Removing agricultural land and green spaces which cannot be returned will affect the wildlife, will increase our carbon footprint, will be a blight on the countryside. There are in the areas surrounding AB2 a massive amount of industrial units and warehouses, one former local MP was quoted as saying he did not want his area to become known as 'the capital of warehouses'. They can be seen all around from any high ground like the Wedgewood Monument, or Apedale Country Park, JCB has a big presence too. We understand the need for employment land but there are plenty out there lying empty and unused</li> </ul> <p><b>- PLEASE REMOVE AB2 FROM THE LOCAL PLAN AS IT IS NOT SOUND</b></p>
<b>Q7 Modification</b>	<b>PLEASE REMOVE AB2 FROM THE LOCAL PLAN AS IT IS NOT SOUND</b>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6391214
<b>Q10 File 2</b>	6391331
<b>Attachments</b>	<a href="#">1339680 Linda Ford 1.png</a> <a href="#">1339680 Linda Ford 2 .png</a>

<b>Comment ID</b>	NULLP951
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Hamnett
<b>Consultee Given Name</b>	Mr and Mrs
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	Please see attached representations. Policy PSD 2 confirms that Rural Centres will meet some of the development need within the Borough and that this will include 'Baldwin's Gate'. This broad approach is supported as our client's proposal would help contribute towards providing housing in these locations.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3 and PSD4 so that we can demonstrate why the Stone House Farm, Baldwin's Gate site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1341959 Stone House Farm, Baldwins Gate.pdf</a>
<b>Comment ID</b>	NULLP953
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Hamnett
<b>Consultee Given Name</b>	Mr and Mrs
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy seeks to define Development Boundaries, Rural Centres and Other Settlement Boundaries within the draft Policy Map.</p> <p>Criterion 2 goes on to state that: "Within Development or Other Settlement Village Boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan."</p> <p>Criterion 4h goes on to state that new development will be supported in the open countryside: "Where the development meets a demonstrable local housing need such as affordable housing and / or self-build plots".</p> <p>The footnote to this policy goes on to state that self-build plots "must be directly adjacent to the development boundary and other residential development".</p> <p>Our client is broadly in support of this proposal in that this policy as it acknowledges the need to promote self-build dwelling adjacent to development boundaries, including Baldwin's Gate. It is the intention that this site would include some self-build plots and in doing so would provide an alternative offer to the type of houses that are building proposed on the Baldwins Gate Farm site or the Jones Homes site.</p> <p>However, the draft Policy Map excludes our client's site from the proposed Baldwin's Gate settlement boundary, and in doing so this would result in a missed opportunity to build upon the sustainable credentials of this village, particularly in the light of the Baldwins Gate Farm decision.</p> <p>It is therefore recommended that the Policy Map be amended along the lines illustrated in Figure 2 (see attachment). This would include the Jones Homes site to the east of Sandy Lane and our clients' site; resulting in the logical rounding off of this part of the village.</p> <p><b>SUMMARY</b></p> <p>It has been demonstrated that there is a clear and robust argument in favour of including Land at Stone House Farm within the proposed settlement boundary for Baldwins Gate set out in Figure 2 of this report. This site would be a logical addition to the Rural Centre of Baldwin's Gate, an area which has been established as part of the Baldwins Gate Farm appeal to be an inherently sustainable location.</p> <p>The site would bring forward substantial benefits to Baldwin's Gate and the Borough as a whole and would align with the Government's aspirations to deliver 1.5 million homes during the next parliament (with the Borough identified as needing to accommodate 193 new homes per year). The proposal would provide much needed family market and potentially self-build homes.</p>



<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3 and PSD4 so that we can demonstrate why the Stone House Farm, Baldwin's Gate site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1341959 Stone House Farm, Baldwins Gate.pdf</a>
<b>Comment ID</b>	NULLP950
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Hamnett
<b>Consultee Given Name</b>	Mr and Mrs
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that:  "A minimum of 7,160 dwellings will be delivered in the Borough of the Plan period 2020-2024 which equates to 358 dwellings per annum."  3.3 Notwithstanding the above, the draft National Planning Policy Framework identified that the Borough will need to deliver a further 193 dwellings per year in addition to this amount, which is likely to be accommodated through a future review of the plan.  The site at Stone House Farm would contribute towards enabling the Council to meet this identified housing requirement.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3 and PSD4 so that we can demonstrate why the Stone House Farm, Baldwin's Gate site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1341959 Stone House Farm, Baldwins Gate.pdf</a>
<b>Comment ID</b>	NULLP954
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Hamnett
<b>Consultee Given Name</b>	Mr and Mrs
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q6 Details</b>	<p>Please see attached representations. Knights have been instructed by our client to promote land located adjacent to their home at Stone House Farm, Woodside within a settlement boundary for Baldwin's Gate in the emerging Local Plan 2020-2040.</p> <p>Our clients live at Stone House Farm which comprises their main family home, arecently approved residential annexe for their parents (LPA ref. 21/00479/FUL) and a cluster of steel framed commercial buildings. Their property sits centrally within 4.68 hectares of land which bounds Woodside and Sandy Lane to the east and the Newcastle Road (A53) to the north. The extent of our client's ownership is contained in Appendix A (see attachment).</p> <p>Our clients previously promoted this site as a residential development in August 2023 through the Regulation 18 version of the Local Plan.</p> <p>Knights have engaged in pre-application discussions with the LPA in respect of redeveloping the eastern portion of the site (fronting Sandy Lane and Woodside) for residential development (during 2023 and 2024) where the LPA have accepted that this site would constitute a sustainable location for new housing. It is anticipated that an outline planning application will be submitted towards the end of 2024. To support the pre-application submission, PGLA Landscape Architects produced a landscape led indicative layout, Charnia Ecology produced a Preliminary Ecological Appraisal and Pell Frischmann produced a Technical</p>

	<p>Transport Note (including consideration of the access to the site) all of which demonstrates how the development could be accessed and to demonstrate that the scheme could be technically sound.</p> <p>However, given the sustainable location of this site, and the need for land for additional housing in the borough, the whole of our client's land interests are presented for allocation, which is a site beyond the extent of that presented at preapplication stage.</p> <p>Planning permission has recently been approved on 12 July 2023 (at appeal) to develop land at Baldwins Gate Farm (to the north of the site) under LPA ref 21/01041/OUT to provide 200no. dwellings set within a community parkland. This would be located directly to the north of our client's land (bounding the Newcastle Road). When allowing that appeal, the Inspector concluded at paragraph 16 that that site "would be in a suitable location for new housing having regard to the availability of public transport" thereby complying with Policy SP3 of the Core Strategy and paragraph 109 of the Framework. As part of that proposal substantial highway improvements are proposed around the Sandy Lane junction which is located adjacent to our client's site, and this will serve as a key gateway feature when entering the village from the west.</p> <p>Planning permission has also been approved for a small infill development along Madeley Road (LPA ref 21/00217/REM). To the east of our client's site, a planning application was submitted by Jones Homes in March 2023 proposing 40no. dwellings at a site known as 'Land to East of Woodside' which as an LPA ref. of 22/01105/FUL. At the time of submission this application remains undetermined.</p> <p>The draft Policy Map currently shows our client's site located outside of the Baldwin's Gate settlement boundary. However, the approval of the Baldwin's Gate Farm site at appeal has resulted in this site being allocated as a residential allocation (Allocation ref. LW74) in the Regulation 19 version of the Local Plan. Equally, should the Jones Homes site be approved by that time, this would also expand the extent of built development towards the eastern side of Sandy Lane. In such an event, it is considered that our client's site would form a logical bookend to the western portion of Baldwins' Gate village boundary, providing residential dwellings fronting Sandy Lane and Woodside and rounding off the village.</p> <p>Our clients' site is located just outside of the settlement boundary for Baldwin's Gate in the Draft Policy Map allocation, as shown in Figure 1. The site therefore presently falls within the open countryside (but not Green Belt).</p> <p>It is requested that our client's site be included within the proposed Policy Map to enable it to be developed for residential purposes.</p> <p><b>PROPOSED RESIDENTIAL DEVELOPMENT AT STONE HOUSE FARM</b></p> <p>It is envisaged that the entire Stone House Farm site could be redeveloped to provide a mix of dwellings, which would include an internal access road.</p> <p>It is intended that a proportion of these dwellings could be self-build plots, thereby introducing an opportunity for people wishing to design and build their own homes.</p> <p>Initial advice from Pell Frischmann has informed the indicative layout presented at pre-application stage, with the scheme utilising only the existing access off Woodside (rather than proposing additional access to the north to avoid potential conflict with the road infrastructure that is being proposed on adjacent sites).</p> <p>The proposed pre-app scheme is in its very early stages of development however a landscaped-led scheme is being developed by PGLA Landscape Architects which could introduce areas of biodiversity rich landscaping as well as reinforce a defensible boundary on the western edge of the site.</p> <p><b>SUMMARY</b></p> <p>It has been demonstrated that there is a clear and robust argument in favour of including Land at Stone House Farm within the proposed settlement boundary for Baldwins Gate set out in Figure 2 of this report. This site would be a logical addition to the Rural Centre of Baldwin's Gate, an area which has been established as part of the Baldwins Gate Farm appeal to be an inherently sustainable location.</p> <p>The site would bring forward substantial benefits to Baldwin's Gate and the Borough as a whole and would align with the Government's aspirations to deliver 1.5 million homes during the next parliament (with the Borough identified as needing to accommodate 193 new homes per year). The proposal would provide much needed family market and potentially self-build homes.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3 and PSD4 so that we can demonstrate why the Stone House Farm, Baldwin's Gate site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1341959 Stone House Farm, Baldwins Gate.pdf</a>
<b>Comment ID</b>	NULLP952
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Hamnett
<b>Consultee Given Name</b>	Mr and Mrs
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3

<b>Q6 Details</b>	Please see attached representations. The Regulation 19 plan has now identified Baldwin's Gate as one of the Rural Centres, for which it is identified as accommodating in the region of 250no. new homes. Whilst the Baldwins Gate Farm Allocation (Policy LW74) commits 200no. dwellings on the western edge of Baldwins Gate, the balance of this number could come forward in the southwest portion of the village (including our client's site). Indeed the draft National Planning Policy Framework identifies that the Council will need to provide 193no. new dwellings per year to accommodate its new housing targets, and our client's site could accommodate some of this in a sustainable manner.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3 and PSD4 so that we can demonstrate why the Stone House Farm, Baldwin's Gate site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1341959 Stone House Farm, Baldwins Gate.pdf</a>

<b>Comment ID</b>	NULLP1449
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Handley
<b>Consultee Given Name</b>	Maria Stella
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Thank you for your research and study into these plans. We are grateful. Its good to know that our community is nor prepared to give in without a fight. I agree with all your hard work in producing this information for the residents of Red Street and district.</p> <p>We would require at least another through road/street to ease the traffic on Crackley Bank especially at school times as well as a larger school. We are also concerned that our street (redacted by admin) will become much busier that it already is at school times in the morning and afternoon. I would hate to see busses and heavier traffic using it as a rat run. Thank you for all your hard work</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1389
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Handley
<b>Consultee Given Name</b>	Maria Stella
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b>

**Regulation 19 Publication – Not Compliant with Duty to Co-operate**

When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

**Q10 File 1**

6383617

**Attachments**[reg 19 red street diagram.png](#)



<b>Comment ID</b>	NULLP1467
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hansell
<b>Consultee Given Name</b>	Jason
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1466
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hansell
<b>Consultee Given Name</b>	Jason
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this</p>

	<p>fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1340
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Harding
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1399
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Harding
<b>Consultee Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b></p> <p>I AGREE WITH ALL OF THE ABOVE</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



Comment ID	NULLP1225
Order	7
Title	How to respond to the consultation
Consultee Family Name	Hardstaff
Consultee Given Name	Angela
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p>he plan was first introduced with limited public consultation. I was unaware of the plan and the way it affected our area, until the second phase. The regulation notices that were posted, were not placed in easily accessible areas, and would not be seen by most of the local population.</p> <p>There were no consultations held with the community in Red Street, even though the community is diverse - it has a significant aging population, and a number the community have disabilities. Travelling to consultations outside the local area, would be difficult for some and many don't drive and bus routes are very limited. There was little attempt to ensure that all members of the community could easily access the local plan, this discriminated against some members of the local population. How can residents make informed contributions about their locality when they are not properly involved in the consultation process?</p> <p>The council did not have any plans to hold a meeting with residents in Red Street, who would be significantly affected by the proposed local plan. This is negligent, especially as they were specifically requested to engage directly with Red Street residents. Members of the community had to organise a local meeting - which was very well attended and enabled people to express their very serious concerns about the council's proposals. This should have been organised by the council, if they were to demonstrate a true spirit of consultation.</p> <p>Most people were not aware of the proposals until a late stage in the process. Many who submitted responses to the Regulation 18 notice only received an acknowledgement and response if they included an email address. This discriminates against those people whose main communication means do not include I.T. methods.</p> <p>No Regulation 19 notices were published in the vicinity of Red Street. There was no publicising by the council of community consultation dates. Most people were unaware that they needed to make further responses for the final Local Plan.</p>
Q10 File 1	6391045
Attachments	<a href="#">1341203 Angela Hardstaff.png</a>
Comment ID	NULLP1226
Order	159
Title	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
Consultee Family Name	Hardstaff
Consultee Given Name	Angela
Q4 Part of document	Policy
Q4 Policy	CT1
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p><b>Local Draft Plan</b></p> <p><b><u>Policy CT1 - land at Red Street and High Carr Farm. Chesterton - pls. 116,117.</u></b></p> <p>This part of the Local Plan is <b><u>unsound</u></b>.</p> <p>This land is greenbelt land. It was classified as greenbelt for good reason:-</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up areas</li> <li>• to prevent neighbouring towns from merging into one another</li> <li>• to assist in safeguarding the countryside from encroachment</li> <li>• to preserve the setting and special character of historic towns</li> <li>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p><b>The Green Belt Site Review Consolidated Report (16 July 2024)</b></p> <p>states that site CT1 should not be progressed if site TK17 is put forward.</p> <p>TK17 remains in the plan. Both sites being taken forward would constitute unrestricted sprawl and the merging of two distinct neighbourhoods, Those of Red Street and Talke/Butt Lane).</p>

In addition the documents relating to CT1 and CT4 state that they are within 800m of an existing Dr.'s surgery. This is incorrect, and reveals an example of the flaws in the local planning.

In addition the proforma for CT1 states, *"Consideration would also need to be given to the remaining area of Green Belt to the south (inc. site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4) "*

In the Regulation 19 plan, CT4 and CT1 have been removed, leaving CT1A. Therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area. This would lead to a loss of biodiversity, and the isolation of wildlife in a pocket of land unconnected to the greenbelt.

This is also the case for Proforma CT1. According to the Green Belt site assessment, the plans for CT1 should only go ahead if CT4 is also included which is not the case, as CT4 has been removed from the Local Plan.

Additionally, site CT1A, from the Green Belt Site Review, is being taken forward in the Local Plan. However, it is referenced as CT1 in the Local Plan document, which is misleading, - and makes it difficult to cross-reference.

Local residents are aware that the CT1 area supports a wide range of wildlife, including mice, hedgehogs, foxes, and badgers. Hedgehogs are in danger and their habitats need to be protected. A pair of hedgehogs were in our garden which backs onto CT1 only a couple of weeks ago. Also the trees, fields and hedgerows provide habitats for a wide range of birds, including goldfinches and other finches,

starlings (currently in serious decline), blackbirds, a range of tits, wrens, sparrow-hawks. It also provides support for visiting birds such as geese, partridge, and greater spotted woodpeckers.

The development of CT1 would destroy this precious biodiversity.

Therefore the decision-making in the Final local Plan is unsound as there is no proper justification for including CT1 in the plan.

#### **The history of mining in the CT1 area also makes its inclusion in the Final Plan unsound.**

The CT1 site was mined between 1860 and 1930. The coal was extracted using pillar and stall mining methods, leaving pillars of coal to support the land. As a result several sink holes and collapses have occurred upon this land.

There is evidence of a significant fault line ( High Carr Fault) present at the south east part of CT1.

The housing that is in existence has been subject to pinning , bracing and strapping. My house for example has had extensive such work carried out upon it. I have great concern that the proposals in the Final Plan would compromise the structure of my home and the homes of many others living in this area. The negative impact on the structure of our existing buildings would be likely to be serious.

The extent of the mining that has been carried out in the CT1 area has not been fully established by the borough council. The extent of the mining, the resulting instability of the land and the location of the fault line for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Current ownership of the land in CT1.**

The land in CT1 is owned by several parties. There is no proposal for compulsory purchase of the land. Individual arrangements will have to be made between land owner and developer. There are no safeguards to ensure that the proposed development works well as a joined-up project. So, eg. what if one landowner decides to sell, and another decides not to.

Again - this is not a sound basis for moving forward with the plan for CT1.

#### **Local Infrastructure**

The proposed significant development on CT1 would inevitably lead to higher volume of traffic. The Local Plan has not reasonably taken into account the impact that this would have upon the village of Red Street.

Many of the houses on the main route through Red Street, are lovely old terraced properties. However they have to park their cars on the road, which means that the main route through the village is narrow, and can create health and safety issues in just trying to cross the road.

Nearby the A34 frequently is heavily congested - and frequently flooded at the nearby roundabout, this means that traffic uses Red Street as a means to escape congestion. This already causes issues re safety and pollution.

The proposed developments in the local area could lead to over 1000 additional vehicles, putting pressure on the road network, increasing pollution and putting residents at even greater risk of accidents.

Red Street has a small Primary School, and again this causes significant problems with parking and traffic and children and adults trying to cross the road. There have been some "near misses. The proposals are unsound - as they place people at greater risk of accidents.

I understand that the plan does make provision for developers to make payments to enhance local schools and "a community hub" - but how will this work if the development is split between several companies and if land sales are occurring at different times there can be no joined-up approach. There are examples locally of other developments that have not delivered on their promises. eg Moss Grove the additional street lighting promised along Deans Lane has not materialised adding to higher pedestrian risk. Also additional support promised for local schools did not materialise.

	<p>The local primary school would be affected by this plan - and would be expected to accommodate more children. This would put the school at risk because there are already a significant number of mobile classrooms there - and they are not conducive to appropriate learning environments.</p> <p>Access to a GP in this area is very difficult. The lack of General Practitioners in the area already poses many difficulties. To overload existing practices even more could have a devastating effect upon our local population and the rise in the number of patients per GP is likely to become unmanageable.</p> <p>The Local Plan has not taken into account</p> <ul style="list-style-type: none"> <li>the future needs for Primary and Secondary school places</li> <li>the need for Doctors' surgeries for the area</li> <li>the need for Dentists in the area</li> <li>the need for CAMHS and general mental health support</li> <li>the need for green spaces</li> </ul> <p>to name but a few - and all of which will be placed under even more pressure even though they are struggling to cope.</p> <p>Bus routes have been cut - leading to great difficulty for many in the local population struggling to be able access either of the nearest GP surgeries.</p> <p><b>All of the above issues briefly outline why the Local Plan is not legally compliant, is unsound and is not compliant with the duty to cooperate.</b></p>
<b>Q7 Modification</b>	<p>I, (along with the local residents of Red Street) have collated sufficient evidence to show that the proposals for CT1 need to be removed from the Local Plan. The Greenbelt assessment states that CT1 should NOT be in the plan if TK17 remains.</p> <p>TK17 has remained in the Local Plan.</p> <p>Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan.</p> <p>Therefore the removal of CT1 from the plan is imperative, so that the plan falls in line with the site selection process and with the supporting information outlined in the Greenbelt Assessment.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>I think that it would be necessary for as many people as possible, who will be affected by the proposals regarding CT1, to participate in the hearing sessions, as the proposals mean that their lives and quality of life would fundamentally change.</p> <p>Additionally representation needs to be made to limit the everlasting damage that could be done to the environment.</p>
<b>Q10 File 1</b>	6391045
<b>Attachments</b>	<a href="#">1341203 Angela Hardstaff.png</a>

Comment ID	NULLP1142
Order	159
Title	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
Consultee Family Name	Hardstaff
Consultee Given Name	Jack
Q4 Part of document	Policy
Q4 Policy	CT1
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p><b>Local Draft Plan</b></p> <p><b><u>Policy CT1 - land at Red Street and High Carr Farm, Chesterton - pls. 116,117.</u></b></p> <p>This part of the Local Plan is <b><u>unsound</u></b>.</p> <p>This land is greenbelt land. It was classified as greenbelt for good reason:-</p> <ul style="list-style-type: none"> <li>• to check the unrestricted sprawl of large built-up areas</li> <li>• to prevent neighbouring towns from merging into one another</li> <li>• to assist in safeguarding the countryside from encroachment</li> <li>• to preserve the setting and special character of historic towns</li> <li>• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p><b>The Green Belt Site Review Consolidated Report (16 July 2024)</b></p> <p>states that site CT1 should not be progressed if site TK17 is put forward.</p> <p>TK17 remains in the plan. Both sites being taken forward would constitute unrestricted sprawl and the merging of two distinct neighbourhoods, Those of Red Street and Talke/Butt Lane).</p> <p>In addition the documents relating to CT1 and CT4 state that they are within 800m of an existing Dr.'s surgery. This is incorrect, and reveals an example of the flaws in the local planning.</p> <p>In addition the proforma for CT1 states, "<i>Consideration would also need to be given to the remaining area of Green Belt to the south (inc. site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4) "</i></p> <p>In the Regulation 19 plan, CT4 and CT1 have been removed, leaving CT1A. Therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area. This would lead to a loss of biodiversity, and the isolation of wildlife in a pocket of land unconnected to the greenbelt.</p> <p>This is also the case for Proforma CT1. According to the Green Belt site assessment, the plans for CT1 should only go ahead if CT4 is also included which is not the case, as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A, from the Green Belt Site Review, is being taken forward in the Local Plan. However, it is referenced as CT1 in the Local Plan document, which is misleading, - and makes it difficult to cross-reference.</p> <p>Local residents are aware that the CT1 area supports a wide range of wildlife, including mice, hedgehogs, foxes, and badgers. Hedgehogs are in danger and their habitats need to be protected. A pair of hedgehogs were in our garden which backs onto CT1 only a couple of weeks ago. Also the trees, fields and hedgerows provide habitats for a wide range of birds, including goldfinches and other finches, starlings (currently in serious decline), blackbirds, a range of tits, wrens, sparrow-hawks. It also provides support for visiting birds such as geese, partridge, and greater spotted woodpeckers.</p> <p>The development of CT1 would destroy this precious biodiversity.</p> <p>Therefore the decision-making in the Final local Plan is unsound as there is no proper justification for including CT1 in the plan.</p> <p><b><u>The history of mining in the CT1 area also makes its inclusion in the Final Plan unsound.</u></b></p> <p>The CT1 site was mined between 1860 and 1930. The coal was extracted using pillar and stall mining methods, leaving pillars of coal to support the land. As a result several sink holes and collapses have occurred upon this land.</p> <p>There is evidence of a significant fault line ( High Carr Fault) present at the south east part of CT1.</p> <p>The housing that is in existence has been subject to pinning , bracing and strapping. My house for example has had extensive such work carried out upon it.</p> <p>I have great concern that the proposals in the Final Plan would compromise the structure of my home and the homes of many others living in this area. The negative impact on the structure of our existing buildings would be likely to be serious.</p>

	<p>The extent of the mining that has been carried out in the CT1 area has not been fully established by the borough council. The extent of the mining, the resulting instability of the land and the location of the fault line for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Current ownership of the land in CT1.</b></p> <p>The land in CT1 is owned by several parties. There is no proposal for compulsory purchase of the land. Individual arrangements will have to be made between land owner and developer. There are no safeguards to ensure that the proposed development works well as a joined-up project. So, eg. what if one landowner decides to sell, and another decides not to.</p> <p>Again - this is not a sound basis for moving forward with the plan for CT1.</p> <p><b>Local Infrastructure</b></p> <p>The proposed significant development on CT1 would inevitably lead to higher volume of traffic. The Local Plan has not reasonably taken into account the impact that this would have upon the village of Red Street.</p> <p>Many of the houses on the main route through Red Street, are lovely old terraced properties. However they have to park their cars on the road, which means that the main route through the village is narrow, and can create health and safety issues in just trying to cross the road.</p> <p>Nearby the A34 frequently is heavily congested - and frequently flooded at the nearby roundabout, this means that traffic uses Red Street as a means to escape congestion. This already causes issues re safety and pollution.</p> <p>The proposed developments in the local area could lead to over 1000 additional vehicles, putting pressure on the road network, increasing pollution and putting residents at even greater risk of accidents.</p> <p>Red Street has a small Primary School, and again this causes significant problems with parking and traffic and children and adults trying to cross the road. There have been some "near misses. The proposals are unsound - as they place people at greater risk of accidents.</p> <p>I understand that the plan does make provision for developers to make payments to enhance local schools and "a community hub" - but how will this work if the development is split between several companies and if land sales are occurring at different times there can be no joined-up approach. There are examples locally of other developments that have not delivered on their promises. eg Moss Grove the additional street lighting promised along Deans Lane has not materialised adding to higher pedestrian risk. Also additional support promised for local schools did not materialise.</p> <p>The Local Plan has not taken into account</p> <ul style="list-style-type: none"> <li>the future needs for Primary and Secondary school places</li> <li>the need for Doctors' surgeries for the area</li> <li>the need for Dentists in the area</li> <li>the need for CAMHS and general mental health support</li> <li>the need for green spaces</li> <li>to name but a few - and all of which will be placed under even more pressure even though they are struggling to cope.</li> </ul> <p>Bus routes have been cut - leading to great difficulty for many in the local population struggling to be able access either of the nearest GP surgeries.</p> <p><b>All of the above issues briefly outline why the Local Plan is not legally compliant, is unsound and is not compliant with the duty to coop</b></p>
<b>Q7 Modification</b>	<p>I, (along with the local residents of Red Street) have collated sufficient evidence to show that the proposals for CT1 need to be removed from the Local Plan.</p> <p>The Greenbelt assessment states that CT1 should NOT be in the plan if TK17 remains.</p> <p>TK17 has remained in the Local Plan.</p> <p>Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together.</p> <p>CT4 has been removed from the plan.</p> <p>Therefore the removal of CT1 from the plan is imperative, so that the plan falls in line with the site selection process and with the supporting information outlined in the Greenbelt Assessment.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1141
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hardstaff
<b>Consultee Given Name</b>	Jack
<b>Q5 Legally compliant</b>	No

Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p>The plan was first introduced with limited public consultation. I was unaware of the plan and the way it affected our area, until the second phase. The regulation notices that were posted, were not placed in easily accessible areas, and would not be seen by most of the local population.</p> <p>There were no consultations held with the community in Red Street, even though the community is diverse - it has a significant aging population, and a number the community have disabilities. Travelling to consultations outside the local area, would be difficult for some and many don't drive and bus routes are very limited. There was little attempt to ensure that all members of the community could easily access the local plan, this discriminated against some members of the local population. How can residents make informed contributions about their locality when they are not properly involved in the consultation process?</p> <p>The council did not have any plans to hold a meeting with residents in Red Street, who would be significantly affected by the proposed local plan. This is negligent, especially as they were specifically requested to engage directly with Red Street residents. Members of the community had to organise a local meeting - which was very well attended and enabled people to express their very serious concerns about the council's proposals. This should have been organised by the council, if they were to demonstrate a true spirit of consultation.</p> <p>Most people were not aware of the proposals until a late stage in the process. Many who submitted responses to the Regulation 18 notice only received an acknowledgement and response if they included an email address. This discriminates against those people whose main communication means do not include I.T. methods.</p> <p>No Regulation 19 notices were published in the vicinity of Red Street. There was no publicising by the council of community consultation dates. Most people were unaware that they needed to make further responses for the final Local Plan.</p>
Q8 Hearing attendance	Yes, I wish to participate in hearing session(s)
Comment ID	NULLP1143
Order	159
Title	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
Consultee Family Name	Hardstaff
Consultee Given Name	Jack
Q4 Part of document	Policy
Q4 Policy	CT1
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p><u>Re - Newcastle-under-Lyme Borough Council - local draft plan</u></p> <p><b>RE: CT1 TK30</b></p> <p><b>Environmental impact</b></p> <p>The environmental impact of destroying green belt land would be catastrophic.</p> <p>(redacted by admin)</p> <p>Over the past 30 years as people who are passionate about wildlife and natural history, we have enjoyed a landscape character of vast open spaces, traditional undulating fields, trees and hedgerows.</p> <p>We have seen close up the bio-diversity of animals and plants working together in eco-systems on organic farm land, for eg. each spring ground-nesting lapwings breed in the pasture land of the field in question.</p> <p>CT1 - this field is rough grazing and unimproved, which is ideal for these birds.</p> <p>The field is also a home and haven for hundreds of starlings foraging for insects, living symbiotically with grazing sheep.</p> <p>Starlings are protected under the <b>Wildlife and Countryside Act 1981</b>, as are Lapwings, and other species that visit this field and i will refer to.</p> <p>Starling numbers have fallen by 66% since the mid-70's. Lapwing numbers have fallen even more. Because of this they are red-listed as birds of high conservation concern. November can see murmurations of many hundreds of starlings over this area.</p> <p>Other birds within the habitat include grey partridge, barn owl, rooks, jackdaws, fieldfares, many types of sparrows, blackbirds, finches, goldfinch, martins, wood pigeons and collared doves, gulls and terns etc. It is also a hunting ground for sparrow hawks and a pathway for the fox in winter.</p> <p>We estimate there is approximately 1500 metres plus of hedgerow, with hedgerow nesting birds and small mammals in peril if these are destroyed.</p> <p>Destroy this habitat - and this wildlife is gone from the area forever.</p> <p>Sir David Attenborough has unveiled a message at the Natural History museum that states, "The future of the natural world, on which we all depend, is in our hands".</p>



At the unveiling the naturalist said, "Each of us must cherish the natural world that surrounds us from wide open countryside to tiny patches of green in our cities.

#### **Climate Change and Carbon footprint**

The land proposed for building works currently supports the organic growth of pork, Lamb and beef on the farm, where there is also an abattoir which serves the butchers shop in Red Street. Hence zero carbon footprint.

This means that the area has a massive value in lowering the carbon footprint for the area.

Councils have a significant role to play in tackling our climate emergency. How can the destruction of productive greenbelt land and adding further to the urban sprawl that is currently occurring nearby - contribute towards the responsibility to improve our climate?

There are many spaces in the borough that would be suitable for building dwellings - for example, on brown land and previously built upon spaces - that would be far less damaging to nature and to our climate.

#### **CT1 TK 30**

##### **Overshadowing and privacy issues**

(redacted by admin) The spectacular outlook of many square miles of traditional countryside would be completely obliterated at a stroke.

There would be devastating and depressing overshadowing and loss of natural light. Privacy would be totally compromised by being overlooked and new housing would be way out of character with our property and neighbouring properties, some of which date back to the 1800's. Building on this green belt land would increase light, noise and air pollution and create more health issues within the community.

#### **CT1 T K30**

##### **Noise and disturbance**

The semi-rural village of Red Street is in a fairly quiet, tranquil and generally undisturbed setting, with small roads, lanes and avenues. It is generally a safe place for children, and the elderly and vulnerable - for whom we have designated dwellings in Red Street. Traffic mostly is not excessive, which is fortunate as the road system would struggle to cope with increased traffic. This is exemplified when the M6 is closed or experiencing traffic issues, which leads to a sudden surge of traffic along our narrow roads and lanes, creating a logjam and great difficulties for residents. At certain times of the day the A34 is very congested, and couldn't cope with more traffic. The area is already suffering from increased traffic with the devastating building works on Peacock Hay Road.

When the new Wedgewood View estate was recently built, the boundary of which is approximately 150m from the proposed new site, the noise disturbance for the local surrounding community was disproportionate and ongoing.

Pile driving shook the ground and the dB levels continued far in excess of recommended levels for many months.

This site was described in planning as being for up to 50 dwellings.

The proposals for the CT1 site would be a staggering at least **15 times** that amount. An overbearing development with the inevitable associated noise levels, disturbance and pollution, and an infrastructure in the area that would be totally unable to cope.

#### **CT1 TK30**

##### **Meeting Needs**

Red Street is a relatively small community with few amenities. There is a Community Centre, a pub, a butchers, a church, a home for the elderly and designated dwellings for the elderly and vulnerable, as well as housing for families.

It would seem impossible for the village, with meagre amenities to adequately meet the needs and demands of a hugely burgeoning population.

Local GP's are already struggling to meet the needs of the community.

The local primary and secondary schools are ill equipped to cope with their current populations, let alone a much larger number.

There are insufficient dental practices.

Indeed the draft proposals would compromise the needs and would create an incredibly hostile environment for the existing residents; for example, how would extended building works in close proximity to a care home adversely affect the residents?

#### **CT1 TK30**

##### **Exceptional personal circumstances.**

After a life of working hard in public service both my wife and I are now retired and have a number of health issues. (redacted by admin) when a peaceful environment is essential.

We also provide long periods of respite for a family member who is over 90 and very vulnerable and with a variety of health conditions - including heart issues.

My own mental health also means that i require a peaceful environment .

	<p>We found the noise and disturbance from the building works nearby at Wedgewood View to be intolerable at times. The noise levels, dirt and dust and poor air quality emanating from a much larger building site immediately next to us, throughout the days and months ( and possibly years?) and often at unsociable hours, is an horrific prospect.</p> <p>The draft proposals relating to building at this site, were they to go ahead, would surely inevitably lead to significant mental health issues for us and for our family members.</p> <p><b><u>SUBSIDENCE AND SLIPPAGE</u></b></p> <p>As previously mentioned, (redacted by admin), is an old property built upon clay splay footings, and dating back to the mid-1800s . The property has experienced subsidence and slippage, some of its internal structure being testimony to this. This was almost certainly associated with the coal mining footers in very close proximity to the house.</p> <p>In 2003 significant cracks appeared in the upper external bathroom and bedroom walls. Our building society was made aware and strapping and pinning repairs were carried out by specialist builders to make good .</p> <p>We are extremely concerned and fearful that disturbances from groundwork within the vicinity of the house may very well result in further subsidence and slippage, compromising the stability and safety of the property.</p>
<b>Q7 Modification</b>	<p>I, (along with the local residents of Red Street) have collated sufficient evidence to show that the proposals for CT1 need to be removed from the Local Plan.</p> <p>The Greenbelt assessment states that CT1 should NOT be in the plan if TK17 remains.</p> <p>TK17 has remained in the Local Plan.</p> <p>Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together.</p> <p>CT4 has been removed from the plan.</p> <p>Therefore the removal of CT1 from the plan is imperative, so that the plan falls in line with the site selection process and with the supporting information outlined in the Greenbelt Assessment.</p> <p>My wife is a cancer sufferer and her medication for this, along with the pain, discomfort and side effects of medication for possible spinal stenosis, results in extended periods of insomnia and difficult mornings</p> <p>12a Copes Row</p>
<b>Q8 Hearing attendance</b>	<p>Yes, I wish to participate in hearing session(s)</p>

## Hardy, Warren

<b>Comment ID</b>	NULLP42
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Family Name</b>	Hardy
<b>Consultee Given Name</b>	Warren
<b>Q6 Details</b>	Newcastle is getting really bad place to live need to try and get out lived here all my life. You get things pushed on you like it or not can't live here eny longer run by idiots.

<b>Comment ID</b>	NULLP273
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Bridget
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><u>Policy AB12 Land east of Diglake Street</u></p> <p>This policy is ill thought out and <b>unsound</b> for the following reasons;</p> <p>The access point on Diglake Street – how can this be viable? It is a tiny terraced street with parking each side. Only one car can drive up or down. How will 250 additional cars – assuming one car per household – go in and out of Diglake Street and Albert Street onto the main road without causing accidents and traffic jams?</p> <p>Ravens Lane is already difficult to navigate at busy times as cars are parked on both sides of the road. The safety of children has not been taken into account as it is a route going to and from Ravensmead Primary School and the nursery school opposite Albert Street. At the start and end of the school day there is already additional traffic and parking as parents drop off and pick up.</p> <p>For these reasons I wish the Planning Inspector to remove Policy AB12 from the Local Plan.</p>
<b>Comment ID</b>	NULLP272
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Bridget
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><u>Policy AB2 Land at Junction 16 of the M6</u></p> <p>This policy is neither <b>sound</b> nor <b>justified</b> for the following reasons:</p> <p>The site is 40% bigger than required by Newcastle Borough meaning that the housing/employment ration will be out of balance. This will add pressure for even more housing development in the area.</p> <p>The A500 already suffers a bottleneck at busy time of day at Junction 16 of the M6. Junction 15 to 16 of the M6 is notorious for accidents causing traffic jams and bottlenecks in surrounding roads as traffic is redirected. This would be made even worse by developing land at this junction.</p> <p>There is no public transport to the site. It is highly unlikely that people will choose to cycle or use the proposed bus service so potentially 3000 employees will be travelling by road causing huge traffic congestion in and around Audley especially at busy times when people are going to work and taking their children to school.</p> <p>For these reasons I wish the Planning Inspector to remove Policy AB2 should be from the Local Plan.</p>

<b>Comment ID</b>	NULLP103
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Christopher
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>The Draft Local Plan</p> <ul style="list-style-type: none"> <li>• I endorse the general policy comments already circulated by Keele Parish Council and strongly support the view that Keele and Silverdale Parish Councils will need to work together since the planned housing developments will affect both communities.</li> <li>• I am concerned that the promise of a local centre, health centre and primary school is delivered because promises of a shop on the Hawthorns development was not delivered. Will the developers also have to make a contribution Madeley High and/or the Newcastle Academy?</li> <li>• I also note that planned inclusion of social housing is often not delivered by developers "for economic reasons" at a later date. It is a common "get-out" ploy.</li> <li>• There is little in the Local Plan about provision of social housing. I think the Local Authority as the planning authority should establish the existing need for accommodation for homeless families, for old people's bungalows (as at Knights Cross in Keele), for old peoples housing complexes as at the Madeley Centre and for residents with disabilities and then build them to meet real needs.</li> <li>• The local developments will be the biggest since the creation of Park Site. Think creatively. You will not just be building houses you will be creating and transforming communities for years to come. Have you asked experts such as sociologists what more you could and should do?</li> </ul>
<b>Comment ID</b>	NULLP102
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Christopher
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>The Draft Local Plan</p> <ul style="list-style-type: none"> <li>• I endorse the general policy comments already circulated by Keele Parish Council and strongly support the view that Keele and Silverdale Parish Councils will need to work together since the planned housing developments will affect both communities.</li> <li>• I am concerned that the promise of a local centre, health centre and primary school is delivered because promises of a shop on the Hawthorns development was not delivered. Will the developers also have to make a contribution Madeley High and/or the Newcastle Academy?</li> <li>• I also note that planned inclusion of social housing is often not delivered by developers "for economic reasons" at a later date. It is a common "get-out" ploy.</li> <li>• There is little in the Local Plan about provision of social housing. I think the Local Authority as the planning authority should establish the existing need for accommodation for homeless families, for old people's bungalows (as at Knights Cross in Keele), for old peoples housing complexes as at the Madeley Centre and for residents with disabilities and then build them to meet real needs.</li> <li>• The local developments will be the biggest since the creation of Park Site. Think creatively. You will not just be building houses you will be creating and transforming communities for years to come. Have you asked experts such as sociologists what more you could and should do?</li> </ul>

<b>Comment ID</b>	NULLP552
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>AB12 – Land off Diglake Street, Bignall End</p> <p>We oppose the inclusion of AB12 in Newcastle under Lyme's Local Plan on the following grounds.</p> <p><b>Access</b></p> <p>The Primary access to this site on Diglake street isn't just unsuitable but dangerous. Diglake Street is just 5.47m wide, it is lined either side by terraced housing and there are cars parked on both sides. The same is also true of Edward and Albert Street and I have included pictures of all. The access point is currently used as a parking spot for two vans and at least two cars daily, if planning is approved these vehicles will need to move and add to the congestion on already busy street. All three streets are completely blocked on a daily basis by the delivery of online orders, there isn't enough room for them to pull in so they generally need to park in the middle of the road to unload.</p> <p>The suggestion to mitigate this by adding parking for existing residents to the site means that there is an unreasonably detrimental effect on the day to day lives of the people who live in Diglake Street in particular, the houses at the top of the street have no access to the site via the rear of their properties they would need to walk to the parking area and the only access would be at the bottom of the street, this is also the case for all those on the opposite side of the road.</p> <p>The member of staff at the consultation meeting was unable to explain how this would actually work, only that issues would be looked at during the planning stage. In a telephone conversation with Councilor Nick Crisp on 28th September he revealed that planning staff admitted to him that even they don't see it as feasible, the land is included because Staffordshire County Council want to sell it not because it delivers any benefit to the plan.</p> <p>Traffic would need to enter/exit either Diglake or Albert Street to/from the B5500 in order to access the primary entrance. Albert Street adjoins Chapel Street which is also terraced with cars parked along the whole road, visibility is limited at all times due to cars parking on corners. Diglake Street adjoins Ravens Lane and Chapel Street, again with cars parked severely blocking visibility, it is also the spot that the crossing warden for Ravensmead Primary stands in order to cross the children, only this week the school raised concerns for children's welfare due to traffic. The addition of another 200 (minimum) cars using these junctions daily is an accident waiting to happen. I have included pictures of all these areas as the planners at the consultation meeting stated that it had only been inspected during work hours, whilst this wouldn't give a true idea of the scale of the issues it is hard to believe that any expert looking at these streets at any time of day could possibly believe that it is workable, this is especially true at peak times when roads in Bignall End are already beyond capacity</p> <p><b>Greenbelt/Farmland</b></p> <p>The land is currently productive farmland which sits within the greenbelt. It has been recently rented to a farmer who has invested in improving the grass and fencing in order to use it for livestock. This is Staffordshire County Council farmland which has conditions placed upon it for very good reason. The land must be used for agricultural purposes within the councils own regulations on the land, this was implemented on land across the UK in order to protect the nation's food supply. Again not only is this greenbelt land but of importance as farmland too. The proposed development does not meet any criteria to over-ride this very important principal.</p> <p>We regularly see a number of birds of prey hunting in the fields, there are also hedgehogs there, I feed them in my garden and witness them regularly walking into the hedges you propose to destroy for access. The hedges and berries from brambles on the access are also a valuable food source and home for birds and insects. During a time when our eco system is facing collapse due to the decimation of habitat we should be protecting these areas as much as possible not destroying them.</p> <p><b>Flooding</b></p> <p>There is a high risk of flooding should the land be developed. There is a high water table and at the bottom of the proposed site is Brierly Brook, currently the land absorbs run off from Ravens Lane, Diglake and Albert Street, should this change the water would head straight into the brook causing substantial difficulties for adjoining agricultural land. This again would impact food production, exacerbating the damage the site causes.</p> <p><b>Improper scrutiny</b></p> <p>Members of the Council were not given sufficient time to scrutinise large amounts of the plan before a vote.</p> <p>During a consultation meeting I asked Cllr Nick Crisp how he felt that the access onto Diglake Street would work, he was very surprised to learn that access was even suggested there. After further questioning it became apparent that Mr Crisp hadn't actually read any of the Plan before he voted on it. This was witnessed by numerous members of the public and I have to wonder how much the ruling party's members really understand the limitations of the proposed sites given that they simply voted as instructed.</p> <p><b>Conclusions</b></p> <p>*The removal of the land from the Greenbelt is unjustified, it is valuable agricultural land and would impact the surrounding farmland due to inevitable flooding issues.</p> <p>*The removal of available parking for existing residents is unreasonably detrimental to the lives of existing residents.</p>



	<p>*The main pedestrian access to Ravensmead Primary for the people of Bignall End is at the top of Diglake Street. The danger this poses due to increased traffic is great, this renders the proposal unsound.</p> <p>*The site is fundamentally undeliverable, the council planning officers themselves don't know how access would work.</p> <p>*The inclusion of the site is driven by a wish to asset strip Staffordshire County Council rather than the site being appropriate for development.</p> <p>*In order for the Local Plan to be considered sound this site must be removed.</p>
<b>Attachments</b>	<a href="#">1342309 Harrison Site Photos.pdf</a>
<b>Comment ID</b>	NULLP557
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	<p>The consultation itself is seriously flawed. The staff at the arranged public events had little to no knowledge of the sites proposed or the local area, they were unable to answer even the most basic questions put to them and simply kept referring us to the information on the boards or the one member of staff who seemed remotely capable of answering anything.</p> <p>I'm not sure how it could be called a consultation meeting when no staff noted any comments made by anyone, the one gentleman who was able to respond gave generic answers and dismissed all concerns about the effect on the local area with 'well these things have to go somewhere' rather than knowing why particular sites had been chosen or the issues around specific sites.</p> <p>The plan is written in such a way that the average person has no real way of understanding the finer points, it seems to be designed to confuse. The portal to object is so difficult to navigate that it is virtually impossible to use (hence the email after several failed attempts to access). Working through the literature to find appropriate places to list objections is overly complicated and time consuming. It's almost as if they hope that people will give up.</p> <p>The figures used to back up the excessive building have been proved to be incorrect, the council's refusal to look into this means that the entire document is tainted and based around falsehoods.</p> <p>Opposition Councilors raised issues with access to reports prior to the vote on the plan, this was rejected by the ruling party and voted through regardless of any issues raised. It has become apparent that councilors hadn't even read the plan when they voted, decisions as important as this should be done after scrutiny of facts not just to follow the party line.</p>
<b>Comment ID</b>	NULLP561
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Objection to allocation AB2</p> <p>This vast development is completely at odds with the look and make up of our village.</p> <p>It will decimate the local area and wipe out all species of wildlife not just in but around the site, there is a large number of hare's that live there, their numbers have decreased by 80% and developments like this are a contributing factor to that. Please don't let greed be the reason they decline even further. The removal of established trees and hedgerows flies in the face of all environmental policies when there is no proven need for the development within the local area.</p> <p>There are a multitude of very large empty warehouses locally, a lot of which were developed by the very people that wish to destroy even more greenbelt by building AB2 and they have not showed any evidence of a need for more. Even if companies moved to them all that would happen is they would leave yet more empty units elsewhere, this does not warrant the loss of greenbelt. The creation of employment is at best questionable, this would be made up of staff moved from elsewhere not actual creation. The warehouse sector also runs in a constant state of staff shortage, who exactly do they imagine will take these positions?</p> <p>The impact of the additional traffic on the village would be immense and dangerous. The notion that people working on the site would use the A500 is laughable, anyone who lives in areas of the Borough such as Silverdale, Chesterton, Madeley will be cutting through Audley and joining the A500 at the Audley junction. The sheer volume of traffic that uses the emergency entrance to both Keele and Sandbach Services proves that people will also use Park Lane as a shortcut. The lorries from the site will also use the village as an alternative whenever there is a problem on either the A500 and the M6, we have been told by highways that we cannot have traffic calming measures do to the fact that the B5500 is an OFFICIAL alternative so any assertion by the developers that this will not happen is blatantly incorrect.</p>

	<p>The A500 at junction 16 is a real problem area, you don't need to travel this way to know that not a radio traffic report you hear whether in the morning or afternoon doesn't mention that it is an issue. Adding yet more congestion will impact not just Audley but anyone who commutes.</p> <p>The site is currently not just greenbelt but good quality farmland which produces good quality food. The state of current world politics means that if anything we should be trying to increase our food security not destroying land and increasing our reliance upon imports.</p> <p>The site is vastly larger than the Borough state they need, the inclusion of it will lead to an imbalance within the plan itself.</p> <p>Conclusion</p> <p>The above sites are simply the ones that I have the most knowledge of, there are so many proposed land grabs within this plan that our beautiful Borough is at risk of changing beyond recognition. The clear lack of local knowledge by the people who have selected these sites is evident. Despite the assertion that there has been a consultation it has been nothing more than a tick box exercise, all local knowledge has been ignored and legitimate concerns have been dismissed.</p> <p>The whole plan seems to have been driven by profit for developers and the sale of council land in order to fill the 'Black Hole' in finances.</p>
<b>Comment ID</b>	NULLP559
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Audley
<b>Q6 Details</b>	<p>The amount of building suggested for the Parish of Audley will have a devastating effect on the local population.</p> <p>Our roads are already congested due mainly to the fact that local housing is predominantly terraced. Residents have no option other than to park on roads that were designed for an era where the idea that households would own one car never mind two couldn't be imagined. This issue will only be made worse with the introduction of more electric cars when owners will need to park directly in front of their houses to charge.</p> <p>Our Health Centre is at capacity with patients unable to pre book appointments and often having to call several days running to book for the same day. Should they need to accommodate even more residents there would need an incredibly large investment in both the facilities and staffing.</p> <p>Our local schools are also at near capacity. All of them sit in plots that mean they could not extend the physical building without removing the play areas so investment would be of no use. The effect that the inevitable over-crowding in the school would have a serious impact upon the education of our children and the teaching staff.</p> <p>There is a large amount of horse riders which use local roads and lanes, this will become impossible with the added traffic. The knock on effect on the local businesses which support this hobby cannot be overstated.</p>

<b>Comment ID</b>	NULLP939
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Melanie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1. Noise: [redacted by admin] based just a few hundred yards from an exit onto the site and in close proximity of the warehouses themselves. Which when operational 24 hours a day will cause a hugely noticeable increase in noise pollution. Further helped by the area being so rural and quiet this will be amplified and cause distress and unwanted disturbance in our everyday lives, especially during evenings and weekends.</p> <p>2. Roads: Audley roads are village roads, already covered in pot holes and cracks. Barthomley Road is a narrow and hedgerow lined road, no suitable for excess traffic which is highly likely as people will use it to cut through or to enter or exit the back gates of the site. Barthomley Road is narrow with very small laybys to accommodate manoeuvres for passing cars both overall is extremely tight and is very much a single lane. It would be highly dangerous and would likely be the source of many accidents and possible injuries to residents (many are elderly), visitors and wildlife which habitat in the hedgerows and accompanying landscapes. There are no street lights and no public footpaths on Barthomley Road which is in the direct route of the proposed plans.</p> <p>3. Traffic: The site would be a cause of huge traffic congestion on the junction 16 roundabout which connects to the A500 and M6. With a potential 3500 employees and many visitors and deliveries to the site at the main entrance, traffic would be highly excessive and isolate many local people of Audley and surrounding areas and prevent the ability to commute and travel is a reasonable timely manor.</p> <p>4. Size of site: The site is too big and imposing to the village of Audley. The proposal is bigger than the village itself!</p> <p>5. Wildlife: The site is greenbelt land which is home to wildlife and nature, which need preserving. It is the reason we relocated and bought our house in Nov 2022, [redacted by admin] only two years ago to reside in such a tranquil and peaceful village. Not to be destroyed by industry, commercial developments and unsightly and imposing structures, notice and pollution.</p> <p>6. Existing sites and buildings: There are numerous warehouses and commercial sites already built, stood empty and exist within a few miles of the proposed location. Why destroy green belt land.</p>
<b>Q7 Modification</b>	Stop proposed plans and find an alternative area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP184
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Pamela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP224
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Pamela
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.



<b>Comment ID</b>	NULLP555
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Steve
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>AB12 – Land off Diglake Street, Bignall End</p> <p>We oppose the inclusion of AB12 in Newcastle under Lyme's Local Plan on the following grounds.</p> <p><b>Access</b></p> <p>The Primary access to this site on Diglake street isn't just unsuitable but dangerous. Diglake Street is just 5.47m wide, it is lined either side by terraced housing and there are cars parked on both sides. The same is also true of Edward and Albert Street and I have included pictures of all. The access point is currently used as a parking spot for two vans and at least two cars daily, if planning is approved these vehicles will need to move and add to the congestion on already busy street. All three streets are completely blocked on a daily basis by the delivery of online orders, there isn't enough room for them to pull in so they generally need to park in the middle of the road to unload.</p> <p>The suggestion to mitigate this by adding parking for existing residents to the site means that there is an unreasonably detrimental effect on the day to day lives of the people who live in Diglake Street in particular, the houses at the top of the street have no access to the site via the rear of their properties they would need to walk to the parking area and the only access would be at the bottom of the street, this is also the case for all those on the opposite side of the road.</p> <p>The member of staff at the consultation meeting was unable to explain how this would actually work, only that issues would be looked at during the planning stage. In a telephone conversation with Councilor Nick Crisp on 28th September he revealed that planning staff admitted to him that even they don't see it as feasible, the land is included because Staffordshire County Council want to sell it not because it delivers any benefit to the plan.</p> <p>Traffic would need to enter/exit either Diglake or Albert Street to/from the B5500 in order to access the primary entrance. Albert Street adjoins Chapel Street which is also terraced with cars parked along the whole road, visibility is limited at all times due to cars parking on corners. Diglake Street adjoins Ravens Lane and Chapel Street, again with cars parked severely blocking visibility, it is also the spot that the crossing warden for Ravensmead Primary stands in order to cross the children, only this week the school raised concerns for children's welfare due to traffic. The addition of another 200 (minimum) cars using these junctions daily is an accident waiting to happen. I have included pictures of all these areas as the planners at the consultation meeting stated that it had only been inspected during work hours, whilst this wouldn't give a true idea of the scale of the issues it is hard to believe that any expert looking at these streets at any time of day could possibly believe that it is workable, this is especially true at peak times when roads in Bignall End are already beyond capacity</p> <p><b>Greenbelt/Farmland</b></p> <p>The land is currently productive farmland which sits within the greenbelt. It has been recently rented to a farmer who has invested in improving the grass and fencing in order to use it for livestock. This is Staffordshire County Council farmland which has conditions placed upon it for very good reason. The land must be used for agricultural purposes within the councils own regulations on the land, this was implemented on land across the UK in order to protect the nation's food supply. Again not only is this greenbelt land but of importance as farmland too. The proposed development does not meet any criteria to over-ride this very important principal.</p> <p>We regularly see a number of birds of prey hunting in the fields, there are also hedgehogs there, I feed them in my garden and witness them regularly walking into the hedges you propose to destroy for access. The hedges and berries from brambles on the access are also a valuable food source and home for birds and insects. During a time when our eco system is facing collapse due to the decimation of habitat we should be protecting these areas as much as possible not destroying them.</p> <p><b>Flooding</b></p> <p>There is a high risk of flooding should the land be developed. There is a high water table and at the bottom of the proposed site is Brierly Brook, currently the land absorbs run off from Ravens Lane, Diglake and Albert Street, should this change the water would head straight into the brook causing substantial difficulties for adjoining agricultural land. This again would impact food production, exacerbating the damage the site causes.</p> <p><b>Improper scrutiny</b></p> <p>Members of the Council were not given sufficient time to scrutinise large amounts of the plan before a vote.</p> <p>During a consultation meeting I asked Cllr Nick Crisp how he felt that the access onto Diglake Street would work, he was very surprised to learn that access was even suggested there. After further questioning it became apparent that Mr Crisp hadn't actually read any of the Plan before he voted on it. This was witnessed by numerous members of the public and I have to wonder how much the ruling party's members really understand the limitations of the proposed sites given that they simply voted as instructed.</p> <p><b>Conclusions</b></p> <p>*The removal of the land from the Greenbelt is unjustified, it is valuable agricultural land and would impact the surrounding farmland due to inevitable flooding issues.</p> <p>*The removal of available parking for existing residents is unreasonably detrimental to the lives of existing residents.</p>

	<p>*The main pedestrian access to Ravensmead Primary for the people of Bignall End is at the top of Diglake Street. The danger this poses due to increased traffic is great, this renders the proposal unsound.</p> <p>*The site is fundamentally undeliverable, the council planning officers themselves don't know how access would work.</p> <p>*The inclusion of the site is driven by a wish to asset strip Staffordshire County Council rather than the site being appropriate for development.</p> <p>*In order for the Local Plan to be considered sound this site must be removed.</p>
<b>Attachments</b>	<a href="#">1342310 Harrison Site Photos.pdf</a>
<b>Comment ID</b>	NULLP560
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Steve
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Audley
<b>Q6 Details</b>	<p>The amount of building suggested for the Parish of Audley will have a devastating effect on the local population.</p> <p>Our roads are already congested due mainly to the fact that local housing is predominantly terraced. Residents have no option other than to park on roads that were designed for an era where the idea that households would own one car never mind two couldn't be imagined. This issue will only be made worse with the introduction of more electric cars when owners will need to park directly in front of their houses to charge.</p> <p>Our Health Centre is at capacity with patients unable to pre book appointments and often having to call several days running to book for the same day. Should they need to accommodate even more residents there would need an incredibly large investment in both the facilities and staffing.</p> <p>Our local schools are also at near capacity. All of them sit in plots that mean they could not extend the physical building without removing the play areas so investment would be of no use. The effect that the inevitable over-crowding in the school would have a serious impact upon the education of our children and the teaching staff.</p> <p>There is a large amount of horse riders which use local roads and lanes, this will become impossible with the added traffic. The knock on effect on the local businesses which support this hobby cannot be overstated.</p>
<b>Comment ID</b>	NULLP564
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Steve
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Objection to allocation AB2</p> <p>This vast development is completely at odds with the look and make up of our village.</p> <p>It will decimate the local area and wipe out all species of wildlife not just in but around the site, there is a large number of hare's that live there, their numbers have decreased by 80% and developments like this are a contributing factor to that. Please don't let greed be the reason they decline even further. The removal of established trees and hedgerows flies in the face of all environmental policies when there is no proven need for the development within the local area.</p> <p>There are a multitude of very large empty warehouses locally, a lot of which were developed by the very people that wish to destroy even more greenbelt by building AB2 and they have not showed any evidence of a need for more. Even if companies moved to them all that would happen is they would leave yet more empty units elsewhere, this does not warrant the loss of greenbelt. The creation of employment is at best questionable, this would be made up of staff moved from elsewhere not actual creation. The warehouse sector also runs in a constant state of staff shortage, who exactly do they imagine will take these positions?</p> <p>The impact of the additional traffic on the village would be immense and dangerous. The notion that people working on the site would use the A500 is laughable, anyone who lives in areas of the Borough such as Silverdale, Chesterton, Madeley will be cutting through Audley and joining the A500 at the Audley junction. The sheer volume of traffic that uses the emergency entrance to both Keele and Sandbach Services proves that people will also use Park Lane as a shortcut. The lorries from the site will also use the village as an alternative whenever there is a problem on either the A500 and the M6, we have been told by highways that we cannot have traffic calming measures do to the fact that the B5500 is an OFFICIAL alternative so any assertion by the developers that this will not happen is blatantly incorrect.</p> <p>The A500 at junction 16 is a real problem area, you don't need to travel this way to know that not a radio traffic report you hear whether in the morning or afternoon doesn't mention that it is an issue. Adding yet more congestion will impact not just Audley but anyone who commutes.</p>

	<p>The site is currently not just greenbelt but good quality farmland which produces good quality food. The state of current world politics means that if anything we should be trying to increase our food security not destroying land and increasing our reliance upon imports.</p> <p>The site is vastly larger than the Borough state they need, the inclusion of it will lead to an imbalance within the plan itself.</p> <p>Conclusion</p> <p>The above sites are simply the ones that I have the most knowledge of, there are so many proposed land grabs within this plan that our beautiful Borough is at risk of changing beyond recognition. The clear lack of local knowledge by the people who have selected these sites is evident. Despite the assertion that there has been a consultation it has been nothing more than a tick box exercise, all local knowledge has been ignored and legitimate concerns have been dismissed.</p> <p>The whole plan seems to have been driven by profit for developers and the sale of council land in order to fill the 'Black Hole' in finances.</p>
<b>Comment ID</b>	NULLP558
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Harrison
<b>Consultee Given Name</b>	Steve
<b>Q6 Details</b>	<p>The consultation itself is seriously flawed. The staff at the arranged public events had little to no knowledge of the sites proposed or the local area, they were unable to answer even the most basic questions put to them and simply kept referring us to the information on the boards or the one member of staff who seemed remotely capable of answering anything.</p> <p>I'm not sure how it could be called a consultation meeting when no staff noted any comments made by anyone, the one gentleman who was able to respond gave generic answers and dismissed all concerns about the effect on the local area with 'well these things have to go somewhere' rather than knowing why particular sites had been chosen or the issues around specific sites.</p> <p>The plan is written in such a way that the average person has no real way of understanding the finer points, it seems to be designed to confuse. The portal to object is so difficult to navigate that it is virtually impossible to use (hence the email after several failed attempts to access). Working through the literature to find appropriate places to list objections is overly complicated and time consuming. It's almost as if they hope that people will give up.</p> <p>The figures used to back up the excessive building have been proved to be incorrect, the council's refusal to look into this means that the entire document is tainted and based around falsehoods.</p> <p>Opposition Councilors raised issues with access to reports prior to the vote on the plan, this was rejected by the ruling party and voted through regardless of any issues raised. It has become apparent that councilors hadn't even read the plan when they voted, decisions as important as this should be done after scrutiny of facts not just to follow the party line.</p>

<b>Comment ID</b>	NULLP208
<b>Order</b>	9
<b>Title</b>	Sustainability Appraisal and Habitats Regulations Assessment
<b>Consultee Company / Organisation</b>	Sustainable Exercise Partnership (StEP)
<b>Consultee Position</b>	director
<b>Consultee Family Name</b>	Hartveld
<b>Consultee Given Name</b>	Adri
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	2.3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<b>This Draft Final Local Plan does NOT demonstrate sustainable development that helps combat climate change and facilitates carbon reduction. The proposed AB business park is in the wrong place, as well as the proposed housing development between Whitmore Road and Keele University. Both increase car dependency, air pollution and increase climate breakdown.</b>
<b>Q7 Modification</b>	Site Allocation Policy AB2 "Land at Junction 16 of the M6" is wholly in the wrong location. It would be highly damaging to the environment. Amelioration through "Subject to point 13. measures to support travel to / from the development, particularly by sustainable modes, include cycling links into the development, bus routes and demand responsive travel schemes" is not going to work, because it's too far away from where future employees or future customers (of the future distribution businesses such as Amazon) live. The reality would be that employees living in e.g. Silverdale will be forced to travel by car and travel through Alsager Bank and Audley to get to this site. Amazon vans would travel a lot further to make the deliveries to their customers. Chesterton, Chatterley Valley and other brownfield sites in Stoke-on-Trent would be much better locations to increase good employment prospects, reduce car travel and facilitate active travel, to improve people's health.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	So far there appears to be a lack of consideration of the consequences of these "employment" and housing developments. I think we can help to improve the proposals.
<b>Q10 File 1</b>	6385675
<b>Q10 File 2</b>	6385674
<b>Q10 File 3</b>	6385676
<b>Attachments</b>	<a href="#">How active travel will help get Britain building _ Sustrans 2024.odt</a> <a href="#">Stepping-off-the-Road-to-Nowhere _ Sustrans &amp; Create-Streets 2024.pdf</a> <a href="#">Good_Planning_for_Good_Food Sustain 2011.pdf</a>
<b>Comment ID</b>	NULLP209
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Sustainable Exercise Partnership (StEP)
<b>Consultee Position</b>	director
<b>Consultee Family Name</b>	Hartveld
<b>Consultee Given Name</b>	Adri
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy TB19 "Land South of Newcastle Golf Club, Thistleberry"
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Site Allocation for housing in Policy TB19 "Land South of Newcastle Golf Club, Thistleberry" taking away Green Belt land currently used for food production, would increase the environmental strain such as flooding risks and increase in CO2 emissions and air pollution.
<b>Q7 Modification</b>	This site is adjacent to the small wind power and solar energy park at Keele University. It would be a lot better to make this an employment site for Renewable Energy combined with Agriculture.

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	So far insufficient consideration is given to the development of Community Energy.
<b>Q10 File 1</b>	6385678
<b>Q10 File 2</b>	6385677
<b>Q10 File 3</b>	6385679
<b>Attachments</b>	<a href="#">Stepping-off-the-Road-to-Nowhere _ Sustrans &amp; Create-Streets 2024.pdf (1)</a> <a href="#">Good_Planning_for_Good_Food Sustain 2011.pdf (1)</a> <a href="#">How active travel will help get Britain building _ Sustrans 2024.odt (1)</a>
<b>Comment ID</b>	NULLP1150
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Sustainable Exercise Partnership (StEP)
<b>Consultee Position</b>	director
<b>Consultee Family Name</b>	Hartveld
<b>Consultee Given Name</b>	Adri
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q6 Details</b>	<p><u>Policy TB19 Land South of Newcastle Golf Club Alternative proposal</u></p> <p>The current policy TB19 as shown in this draft Local Plan is NOT SOUND.</p> <p>The entire GreenBelt agriculture field between Keele University - M6 - Whitmore Road - Newcastle Golf Club would be lost, decreasing food production, biodiversity and the opportunity for Renewable Energy generation. Housing in this location would increase air pollution, car dependency and flood risks with the subsequent damage to our health and well-being.</p> <p>The current policyTB19 contradicts Policy PSD5: Green Belt. It is "inappropriate development", there are no "very special circumstances, in accordance with the approach set out in the National Planning Policy Framework" and new buildings do not meet an exception listed in the National Planning Policy Framework.</p> <p>The current policy TB19 contradicts Policy CRE2: Renewable Energy 2. The development of renewable or sustainable energy technologies, storage of energy and complementary infrastructure will be supported, subject to conformity with Local Plan policies and the consideration of the cumulative impact of the proposed development along with other committed or completed development. 6.13. Policy CRE2 promotes the use of solar and wind energy generation.</p> <p>Unfortunately, there are no substantial proposals for wind and solar generation in this draft Local Plan. To overcome this lack of vision and soundness with regards to TB19 Green Belt land, the following is proposed instead of another large suburban housing estate: <u>A Wind and Solar Agrovoltatics park, extending Keele Renewable Energy Park</u></p> <p>Please find below the evidence and feasibility for such development.</p> <p>Thank you for your consideration</p> <p><u>References</u></p> <p>-EQUANS (2024) What is Agri-PV? Merging solar power with agriculture, <a href="https://www.equans.com/stossary/what-agri-pv-merging-solarpower-agriculture">https://www.equans.com/stossary/what-agri-pv-merging-solarpower-agriculture</a></p> <p>-Department for Energy Security and Net Zero (2024) "Guidance _ central support for local authorities and local-authorities-and communities" :*: text=The%201o ca%20Net%20Zero%20Hubs%20programme%20helps%20local%20authorities%20and%20Yorkshire%20Local%20Net%20Zero%20Hub</p> <p>-CPRE (2024) "Showcasing Renewables done well" <a href="https://www.cpre.org.uk/what-we-care-about/ctimate-change-and-energy/renewabteenergy/community-energy-visioning-showcasing-renewables-done-well/">https://www.cpre.org.uk/what-we-care-about/ctimate-change-and-energy/renewabteenergy/community-energy-visioning-showcasing-renewables-done-well/</a></p> <p>-Green Alliance (2019) Community Energy 2.0. "The future role of local energy ownership in the UK", <a href="chromeextension://efaidnbmninnibpcajpcgclcfindmkaj/https://green-alliance.org.uk/wp-content/uploads/202ULUCommunity_Energy_2.0.pdf">chromeextension://efaidnbmninnibpcajpcgclcfindmkaj/https://green-alliance.org.uk/wp-content/uploads/202ULUCommunity_Energy_2.0.pdf</a></p> <p>-Ross (2024) "Enborne Solar Farm secures planning permission", <a href="https://www.solarpowerportal.co.uk/enborne-solar-farm-secures-ptanningpermission/">https://www.solarpowerportal.co.uk/enborne-solar-farm-secures-ptanningpermission/</a></p> <p>-Agrovoltatics.com</p> <p>-SolarCC (2024) "Solar Panels for Farms and Agriculture: Necessity or Luxury", <a href="otarcc.com/solar-panets-for-farms-anda">otarcc.com/solar-panets-for-farms-anda</a></p> <p>gricu ltu re/#- :text= NecessiUg62 OorAoZOLuxu ffi3F - ,Solar%20Panels%20far%20Farms%oz0and%20Agriculturey"3A%20Necessity%20o r%20Luxury%3F,economically%20profitable%20use%20of%20farmland.</p>

<b>Comment ID</b>	NULLP927
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Sustainable Exercise Partnership (StEP)
<b>Consultee Position</b>	director
<b>Consultee Family Name</b>	Hartveld
<b>Consultee Given Name</b>	Adri
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The current policy TB19 as shown in this draft Local Plan is NOT SOUND.</p> <p>The entire GreenBelt agriculture field between Keele University – M6 – Whitmore Road – Newcastle Golf Club would be lost, decreasing food production, biodiversity and the opportunity for Renewable Energy generation. Housing in this location would increase air pollution, car dependency and flood risks with the subsequent damage to our health and well-being.</p> <p>The current policy TB19 contradicts Policy PSD5: Green Belt. It is “inappropriate development”, there are no “very special circumstances, in accordance with the approach set out in the National Planning Policy Framework” and new buildings do not meet an exception listed in the National Planning Policy Framework.</p> <p>The current policy TB19 contradicts Policy CRE2: Renewable Energy 2. The development of renewable or sustainable energy technologies, storage of energy and complementary infrastructure will be supported, subject to conformity with Local Plan policies and the consideration of the cumulative impact of the proposed development along with other committed or completed development. 6.13. Policy CRE2 promotes the use of solar and wind energy generation. Unfortunately, there are no substantial proposals for wind and solar generation in this draft Local Plan.</p> <p>To overcome this lack of vision and soundness with regards to TB19 Green Belt land, the following is proposed instead of another large suburban housing estate: A Wind and Solar Agrovoltatics park, extending Keele Renewable Energy Park.</p>



<b>Comment ID</b>	NULLP606
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Janson
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The village infrastructure, Schools, Doctors, Dentists etc is full to capacity, financial contributions to expand are pointless as without taking more greenbelt in the village there is nowhere to expand to. The school premises would have to lose recreation an playground space and therefore impact on health and wellbeing</p> <p>The doctors already you have to wait to get in, there is no more room to expand what is already a relatively modern development which can not cope with any more patients, certainly not another 1000 people</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP604
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Janson
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Access via Diglake Street and B5500 is not safe or sound for the building of an additional 125 dwellings on AB12</p> <p>Diglake Street is a narrow road built, built in the 1800's not intended for the use of motor vehicles, there are already problems using this road due to parked vehicles on both sides of the roads, also issues for pedestrians who sometimes cannot pass on the pavement due to parked cars being mounted on the and they have to walk in the road. Recently, the fire service and the Bin Wagons have been unable to access the road fully due to parking and the width of the road.</p> <p>Then the next issue why this fails to be sound is entering and exiting the B5500, new road/ ravens lane is extremely busy and this is a difficult junction to get out of due to the parked cars on ravens lane and again the width of the toad. There have been 2 car accident by the junction of Diglake street in just a few months which involved cars hitting parked cars and in one of the incidents the road had to be shut. I fail to understand how approximately another 250 cars will be able to use this road as access safely.</p> <p>Pedestrian and emergency vehicle access via B5500 junction on the bend of Ravens Lane is also not sound, this is a very busy stretch of the road and one of the pinch points for congestion, not only at peak times but throughout the day, how anyone hasn't been knocked down here already is beyond me. Potentially another 300+ people using this as access onto a busy pinch point on a main road is not safe. Emergency vehicles would struggle to turn here efficiently at peak times die to congestion and as the road is narrow and has parked cars both sides then there would be nowhere for cars to move out of the way to let emergency services through</p> <p>Impact of construction vehicles throughout the course of the build would again cause chaos as the road infrastructure is not suitable</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP605
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Janson
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	3
<b>Q5 Sound</b>	No

<b>Q6 Details</b>	<p>There is no detail in the plan of how many spaces will be created and how this will be controlled and therefore offers no solution to the parking and therefore access on Diglake Street.</p> <p>There is perhaps around 100 cars and work vehicles parked here so the car park would need to accomodate all of these.</p> <p>Also residents will not want to park their vehicle out of sight and a short walk away and therefore, unless legally enforced people will just continue to park in the same way that they do now impacting sound access to the site via diglake street.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP676
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>With regards to the layout and structure it mentions that the structure will be designed to reflect the local character and not intrusive in significant views in the local area.</p> <p>How can 125 dwellings on Greenbelt not be intrusive, there is no mention with regards the size or materials of these dwellings and how they will not intrude on the views.</p> <p>As this part of policy AB12 lacks detail around how this will be done, how can the developers be held to account, this is just words with no substance that would enforce accountability</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP678
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>"Financial contributions to improvements in the capacity of local schools and health facilities"</p> <p>Again this is impractical and unsound.</p> <p>The Parish is built on Greenbelt area and in terms of capacity to grow our village infrastructure such as schools, Doctors and dentists, there is no space to do this.</p> <p>Ravensmead Primary school is at capacity, another 255 dwellings throughout the parish, including 125 dwellings on AB12 will add 100/200+ children to this school, given class sizes are approx 30 children to a class this would need in the region of around 4 - 8 additional classrooms.</p> <p>The school has nowhere to expand to this kind of size without building a new school in the village in turn taking up more green space.</p> <p>Squeezing additional 100/200 children into the school is not practical and will have an impact on allocation of places to those families already in the parish.</p> <p>We are proud to have a great Doctors surgery in Audley Parish, however, as good as the doctors is, it's difficult as with anywhere to get an appointment, the doctors is relatively modern in terms of structure but there is no space to expand and its always a struggle now to park at the doctors.</p> <p>255 dwellings in the area will see upwards of 700 new people trying to access facilities such as doctors and dentists.</p> <p>the dentist already has a waiting list for new patients.</p> <p>Our village is an Old village full to capacity for developments, financial contributions to expand these services will not be possible and there is no space to expand them too.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP675
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Provision of parking area for local residents on the far corner of the plot is not sound. People living in Diglake street, particularly at the top will not find it practical to park 5 mins walk away when unloading vehicles or with small children, particularly in the bad weather.</p> <p>There is no mention of how this parking will be controlled or how many spaces there is.</p>

	<p>Most houses have 2 cars so there would need to be at least 80+ spaces, taking up space on the Plot and this is not necessary use of Greenbelt land.</p> <p>This will not ease congestion on Diglake street due to the practicalities with shopping, people are sheer lazy and will not want to park their vehicle a 5 min walk away and also will want visibility of their vehicle from a security aspect and also will have an impact on the car insurance premiums.</p> <p>If this parking is enforced and people have to legally use the car park, this will make these properties unsellable as nobody wants to buy a house with no parking or street parking.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP673
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Access to the proposed AB12 site for a 125 dwellings is not in any way sound or safe. The main access via Diglake street is on a narrow terraced housing road with cars currently parked on both sides of the pavement, making it just about passible for one vehicle to pass through. Building an additional 125 houses on AB12 will lead to around 250 extra vehicles passing through Diglake street, causing additional congestion on Diglake street itself, not to mention the time to pull out of Diglake street onto new road or Ravens lane and vice versa the traffic congestion waiting for additional cars to pull into Diglake will have a major impact on the traffic on New road and Ravens lane especially at peak times. Due to the narrowness of Diglake street most cars needs to part park on the pavement, sometimes making it difficult for pedestrians, particularly those with Prams and wheelchairs/scooter to pass on the pavement, leading them to have to use the road, this will be a safety issue for pedestrian's with additional cars using this road. On several occasions, services such as the Bin Lorry and emergency services have been unable to get down Diglake street due to the width of the road and parked cars. With regards to Emergency and pedestrian access via Ravens lane, where the access is planned is probably the worst stretch of this road, its on a bend which already backs up heavily with traffic in both directions and is often blocked with traffic, How an emergency vehicle would be expected to get into that turning at Peak times is beyond me, that main B5500 again is a narrow road with parked cars on each side, only allowing in general one car in each direction, hence the tailbacks at peak times. Where pedestrian access is proposed, there is a blind spot due to the number of parked cars on the bend, in order to cross safely here there would need to be some form of pedestrian crossing, which would have an even greater impact on the traffic. Over the last 6 months there has been 3 significant RTA's on the B5500. 2 of which were right by the entrance to Diglake street, where a car driving up the road has crashed into parked cars, writing one off to which the Police were called and the road closed off. An accident on the B5500 in June saw 2 vehicles collide right on the bend where the proposed pedestrian and emergency access is proposed, Olwitnessed this accident and had I have been walking the dog 30 seconds earlier would have been hit by these vehicle's. Finally on this point I am concerned about the Plant and construction vehicles needed at AB12 to build 125 houses, this will have a severe impact on traffic in the Village and beyond The road is not suitable for HGV vehicles, it's bad enough when the tractors are Farming and drive through the village causing delays, i also fear that a lot of the parked cars will be damaged as</p>
<b>Q7 Modification</b>	<p>I struggle to think what modifications to the plan would make both of these proposed access points sound or safe for AB12. It would potentially have to be a mini roundabout at the top of Diglake which would have a huge impact on both the traffic long-term, this is a very busy road at peak times and the whole road gets congested, in the short term changing the road structure to incorporate a mini roundabout would have severe impact on the traffic and the bus route. I also feel that measures to reduce the speed of the traffic would need to be installed by the pedestrian access on the bend of the B5500 again impacting the traffic through the village. At peak times or when there is delays on the A500 the B5500 is snagged up with HGV vehicles I feel that this road should be restricted to 7.5tonne due to the width of the road and additional cars using the road</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP677
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Heath
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	10
<b>Q5 Sound</b>	No

<b>Q6 Details</b>	<p>"A sequential approach being taken within the site to direct development to areas at lowest risk of flooding, taking account of flood risk from all sources, including sewer and surface water flooding"</p> <p>None of AB12 is suitable due to excess surface water and flooding, even throughout the Summer months this area is boggy and waterlogged.</p> <p>The local infrastructure in terms of sewers are not suitable to make this a sound part of the plan, the Ravens lane area is subject to flooding from the local drains after any periods of heavy lanes, the grids flood and this causes local residents to take action using sandbags across access to the properties particularly (120 &amp; 120a) have issues as they are situated closes to the drains.</p> <p>The flooding can happen quite quickly after the rain and therefore often not time to prepare against flooding's</p> <p>Another 125 dwelling access the same sewage and draining system will only have a negative impact on existing residential properties.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP180
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Heinsohn
<b>Consultee Given Name</b>	Sebastian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Slightly off topic but something I did find very interesting is that during my research of the localised area, I have viewed many maps one of which is a side by side comparative which shows multiple maps dating back to the 1830's and one striking consistent feature is that the area identified in the local plan CT1 has remained relatively unchanged since the 1830's The maps (pre selected) can be viewed here <a href="https://maps.nls.uk/geo/explore/side-by-side/#zoom=16.0&amp;lat=53.05851&amp;lon=-2.25207&amp;layers=257&amp;right=ESRIWorld">https://maps.nls.uk/geo/explore/side-by-side/#zoom=16.0&amp;lat=53.05851&amp;lon=-2.25207&amp;layers=257&amp;right=ESRIWorld</a> this again reminds me that the land is Greenbelt, never been built on and the development will destroy the land, wildlife and overall aesthetics of the area there is also an air shaft into some of the old mine workings on the edge of the proposed CT1 land, approximate location shown in Appendix 2 which I have not yet identified on a coal map to its underground direction For all of the reasons detailed above and in the previous pages I am strongly opposed to this development</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Q10 File 2</b>	6385520
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a> <a href="#">red street diagram 2 .pdf</a>
<b>Comment ID</b>	NULLP223
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Heinsohn
<b>Consultee Given Name</b>	Sebastian

<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>

<b>Comment ID</b>	NULLP196
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Family Name</b>	Higgins
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The plan for AB2 employment site does not appear to be Positively Prepared, documents indicate that the site has been identified by the developers as being within a designated corridor of development along the M6 Northwestern corridor. It appears that this has been a primary driver in the selection of AB2 rather than local need or its value to the wider economic growth within the borough.</p> <p>The size of the proposed AB2 site is far in excess of the stated employment needs of both the Audley Parish and Newcastle Under Lyme Borough. The local statistics for population growth are fluctuating and the population stability is unstable in part due to the inclusion of the student population is this not a sound and justified reason to look to develop the greenbelt.</p> <p>The plan is ineffective, in that the types of jobs offered by the employment site are inconsistent with building a skilled workforce. The documents state that there are 9 million workers within in an hours reach of the proposed site meaning that the economic and employment benefits of the proposed development will largely be felt outside the borough.</p> <p>The plan fails to give substantial weight to the value of using suitable brownfield land – as stated in the National Planning Policy Framework (NPPF), The proposed use of Prime agricultural land cannot be justified when the borough has many suitable brownfields sites available. These areas are in better reach of the local employment market.</p> <p>The local authority is required to show that all reasonable alternatives to greenbelt development have been fully explored, including the use of brownfield sites or underutilised urban land. There is a lack of evidence in the current proposal that these alternatives have been sufficiently considered, which raises concerns about the legitimacy of the decision to encroach on greenbelt land.</p> <p>Due consideration has not been made within the plan for the impact on the local transport infrastructure, the plan suggested that there is a labour market of 9 million people within an hour's drive of the proposed site the proposed site has little to no existing public transport links meaning that travel will primarily be by road.</p> <p>M6 junction 16/ A500 junction on which the proposed site sits is already a very congested link with regular issues forcing traffic to re-route into the local villages and A50 and A34 routes. There is lack of clarity that the impact on the transport infrastructure has been thoroughly considered with additional traffic that 2500 employee journeys and service vehicles and HGVs utilising the proposed lorry park will have on the existing infrastructure.</p> <p>The AB2 development is contradictory to the National Planning policy for promoting of sustainable transport.</p> <p>According to the National Planning Policy Framework (NPPF), greenbelt land is designated to prevent urban sprawl by keeping land permanently open and maintaining the character of the countryside. The NPPF stipulates that development on greenbelt land should only be permitted in exceptional circumstances and that any such development must demonstrate clear, substantial, and sustainable benefits to the public, which I believe this proposal does not provide.</p> <p>The plan would contribute to the loss of open space that is increasingly important in the face of climate change, contradicting the government's commitment to environmental sustainability.</p> <p>I believe that the proposed development of AB2 has not been positively prepared in relation the needs of the borough, it is not justified in that other options for development have not been full explored and will not be effective in delivering the outlined economic needs of the borough.</p>

<b>Comment ID</b>	NULLP260
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Higgins
<b>Consultee Given Name</b>	Joanne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>Dear Sirs</p> <p>I am making representation as owner of the Rigger Rock Venue Marsh Parade Newcastle</p> <p>This property is part of Star Pubs &amp; Bars wider portfolio and has been part of this area as a successful independent live music venue in this location for a considerable number of years.</p> <p>SPB has already made representation in the consultations regarding the proximity of the proposed dwellings that form part of the masterplan for the area and that with any new development that there should be sufficient regard for the existing businesses and their current operations.</p> <p>This should include for appropriate design, siting and orientation of any new dwellings to take account of the existing buildings so that any noise transfer or usual operating of a live music venue is fully anticipated and mitigated as part of the scheme – this could include sound proofing, location of window openings etc so that there is no future potential conflict between the existing businesses and any new properties.</p> <p>From a nuisance /noise perspective the existing situation is acceptable and there have been no issues regarding complaints, noise or nuisance that would negatively impact this business, its future licencing or trading potential and its place in this community is widely accepted.</p> <p>Consideration to be given not only to the impact of any new development but that the existing properties and businesses in this area should be given further consideration or reference in the local plan, The Rigger has a part to play in the community and therefore any development alongside should have regard for this business and the way it currently operates.</p> <p>I am aware that our tenants are also submitting their representations as this impacts their business directly and I have included the below additional points in response to the local plan.</p> <p>'Please give details of why you consider this part of the Local Plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate'.</p> <ul style="list-style-type: none"> <li>• Insufficient Noise Mitigation Protections</li> <li>• Failure to Incorporate the “Agent of Change” Principle</li> </ul> <p>Non-Compliance with the Duty to Co-operate</p> <ul style="list-style-type: none"> <li>• Lack of Consultation with the Venue</li> </ul> <p>Legal Compliance</p> <ul style="list-style-type: none"> <li>• Failure to Protect Cultural and Community Assets: The Local Plan is not legally compliant with the NPPF's commitment to protect and enhance cultural assets. The Rigger is a nationally recognised, award winning live music venue, contributing significantly to local culture and the economy. The Local Plan does not provide clear strategies to safeguard the venue, which goes against NPPF guidelines to sustain and enhance cultural heritage.</li> </ul> <p>'Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 6 above':</p> <ol style="list-style-type: none"> <li>1. Explicit Reference to the Agent of Change Principle</li> <li>2. Strengthening Noise Mitigation Requirements: <ul style="list-style-type: none"> <li>• Comprehensive soundproofing for all residential units within earshot of the venue.</li> <li>• A noise management plan, developed in consultation with the venue, which outlines measures to prevent potential conflicts between residents and the venue.</li> </ul> </li> <li>3. Site-Specific Requirements to Protect the Rigger</li> <li>4. Amend Supporting Text to Acknowledge the Venue's Cultural Importance</li> </ol> <p>I trust that this is sufficient to be taken into the consultation and should you need anything further please do not hesitate to contact me.</p>

<b>Comment ID</b>	NULLP756
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>• AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>• AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>• AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>• AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP768
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p>

The specific policies are: -

- AB2, AB33, AB15 & AB12 – Audley Ward
- BW 1 – Bradwell Ward
- CT 1 – Crackley Bank & Red Street Ward
- KL13 & KL 15 -Keele Ward
- SP11(2) & SP11(3) – Silverdale Ward
- TK 10, TK 27 & BL18 – Talke & Butt Lane Ward

All of these developments impact green belt land, are unsound and should be removed from the plan.

They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.

With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:

- AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution
- AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.

The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.

AB12 will not be close to any amenities with little or no access to a regular bus route.

- AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.

With poor access to health care and education.

- AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.

I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 & AB15 from the plan.

<b>Comment ID</b>	NULLP754
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p>



	<p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP758
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>BW 1 – Bradwell Ward</li> <li>CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>KL13 &amp; KL 15 -Keele Ward</li> <li>SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul>

	<p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP753
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>BW 1 – Bradwell Ward</li> <li>CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>KL13 &amp; KL 15 -Keele Ward</li> <li>SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP757
<b>Order</b>	156
<b>Title</b>	BW1 Chatterley Valley, Lowlands Road
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BW1

<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>• AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>• AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>• AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>• AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP761
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity</p>

which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.

With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:

- AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution
- AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.

The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.

AB12 will not be close to any amenities with little or no access to a regular bus route.

- AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.

With poor access to health care and education.

- AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.

I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 & AB15 from the plan.

<b>Comment ID</b>	NULLP765
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>BW 1 – Bradwell Ward</li> <li>CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>KL13 &amp; KL 15 -Keele Ward</li> <li>SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p>

	<ul style="list-style-type: none"> <li>AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP755
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>BW 1 – Bradwell Ward</li> <li>CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>KL13 &amp; KL 15 -Keele Ward</li> <li>SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan. They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP759
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>• AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>• AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul> <p>The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.</p> <p>AB12 will not be close to any amenities with little or no access to a regular bus route.</p> <ul style="list-style-type: none"> <li>• AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.</li> </ul> <p>With poor access to health care and education.</p> <ul style="list-style-type: none"> <li>• AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.</li> </ul> <p>I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 &amp; AB15 from the plan.</p>
<b>Comment ID</b>	NULLP763
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon</p>



dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.

With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:

- AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution
- AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.

The proposed new car park for resident's in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.

AB12 will not be close to any amenities with little or no access to a regular bus route.

- AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.

With poor access to health care and education.

- AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.

I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 & AB15 from the plan.

<b>Comment ID</b>	NULLP767
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Che
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27
<b>Q6 Details</b>	<p>I wish the Planning Inspectorate to consider my following representations in response to the Newcastle -Under-Lyme Borough Council – Final Draft Local Plan Consultation (Regulation 19)</p> <p>I wish the Planning Inspectorate to remove all policies from the plan which involve any development on Green Belt Land.</p> <p>The specific policies are: -</p> <ul style="list-style-type: none"> <li>• AB2, AB33, AB15 &amp; AB12 – Audley Ward</li> <li>• BW 1 – Bradwell Ward</li> <li>• CT 1 – Crackley Bank &amp; Red Street Ward</li> <li>• KL13 &amp; KL 15 -Keele Ward</li> <li>• SP11(2) &amp; SP11(3) – Silverdale Ward</li> <li>• TK 10, TK 27 &amp; BL18 – Talke &amp; Butt Lane Ward</li> </ul> <p>All of these developments impact green belt land, are unsound and should be removed from the plan.</p> <p>They will all have a negative effect on the Net Biodiversity gain of each local area. Which in turn has a knock-on effect across the Borough. Open spaces are essential for the environment by absorbing carbon dioxide from our atmosphere, which helps reduce climate control. They also provide habitats for a wide range of plants and animals. Open spaces are also important to human health as they can reduce stress, improve mental health, and assist in people sleeping better. They provide areas for physical activity which improve both physical and mental health. Removal of green belt will decrease the air quality within that area, increase respiratory issues for humans and wildlife, and also increase noise pollution.</p> <p>With specific reference to policies AB2, AB33, AB15 and AB12. I ask the Planning inspectorate to remove policies based on the following justifications:</p> <ul style="list-style-type: none"> <li>• AB2 - It is simply the case that the small village of Audley and its surrounding countryside lanes could not cope with the large increase of traffic caused by these policies. The large number of HGV's travelling to the proposed AB2 site would definitely increase the traffic within the Audley area due to the daily traffic jams along the A500 and at M6 Junction 16. Traffic will spill on to local roads e.g. A5500, increasing Noise and air pollution</li> <li>• AB12 - Proposed access to site AB12 via Diglake Street is untenable. This street is small and it is already difficult to drive down due to parked cars on both sides of the terraced street. A new development of houses would make it virtually impassable causing gridlock, increased air pollution, increased noise pollution and limiting access for the emergency services.</li> </ul>

The proposed new car park for residents in Diglake Street due to the proposed AB12 policy would be detrimental to Blue badge Holders, People with mobility issues and Carers of babies and children.

AB12 will not be close to any amenities with little or no access to a regular bus route.

- AB33 – Primary Vehicular access to Park Lane is unsound. This is an already busy junction. AB33 will not be close to any amenities with little or no access to a regular bus route. Creating more traffic therefore noise pollution and air pollution. With an increased danger to pedestrians.

With poor access to health care and education.

- AB15 – The proposed site at AB15 is unsound because of the poor access to health care, education, local amenities and public transport.

I therefore would like the Planning inspectorate to remove Policies AB2, AB12, AB33 & AB15 from the plan.

<b>Comment ID</b>	NULLP1126
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.13
<b>Q6 Details</b>	<p>This will attract crime to the area, and why are HGVs afforded free parking when residents have to pay in town centres? It is acknowledged that HGVs have a higher carbon footprint and greater emissions than private vehicles, yet they are afforded preferential treatment. Additionally, HGVs have the following environmental impacts:</p> <ul style="list-style-type: none"> <li>• Greenhouse gas emissions, primarily Carbon Dioxide and Methane – both contribute to greenhouse effects</li> <li>• Nitrogen Oxides – contribute to smog and human respiratory issues</li> <li>• Particulate matter – contribute to respiratory issues and impact wildlife</li> <li>• Noise pollution – HGV engines produce significant noise pollution that can be disruptive to both people and wildlife</li> </ul> <p>There is no mention of any code of conduct in relation to the HGVs, and due to the nature of the roads around Audley, there will be increased pressure on already busy roads. Further, at times when the M6 is closed or has accidents, then the additional traffic from the development will exacerbate the situation, increasing risk on local roads.</p>
<b>Comment ID</b>	NULLP1130
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.19
<b>Q6 Details</b>	<p>A submitted plan for landscaping and a commitment to levels of hedgerows and trees must be formally made. The outline policy is too vague, and with green areas being significant in relation to climate change, this area does not go far enough. It affords the developers the ignore requirements where it is cost prohibitive. What penalties will be applied? What enforcement and ongoing assessment will be conducted?</p>
<b>Comment ID</b>	NULLP1134
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.23
<b>Q6 Details</b>	<p>This implies that the site sets a wider precedent, and is deliberately vague about the accepted nature of adjustments and / or future use. What protections are afforded to local residents and / or businesses? Who will oversee the adjustments?</p> <p>Please consider these elements in relation to the overall plan, and my overriding view that the specific AB2 plans should be withdrawn.</p>
<b>Comment ID</b>	NULLP1128
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.15

<b>Q6 Details</b>	Cycle routes assume that local residents will be afforded employment at the new facilities, yet there is no mention of prioritization of local employment over wider areas. In all likelihood, workers will be coming from far and wide due to the proximity to the M6, meaning that traffic will increase as will pollution and congestion.
<b>Comment ID</b>	NULLP1132
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.21
<b>Q6 Details</b>	<p>Has the carbon impact of the materials planned for use been considered? There must be a total overall assessment of the impact in terms of materials used, carbon impact of manufacture, energy source for creation of materials, transportation costs and any view on contingency where materials are damaged in transit, delivery or on-site.</p> <p>Assessments need the following areas to be fully considered:</p> <ul style="list-style-type: none"> <li>• Climate Scenarios – what are the anticipated and future climate projects relevant to the project location? How does this align with prediction models and future forecasts?</li> <li>• Embodied Carbon – assessment of carbon footprint of all materials used in construction, including transportation, manufacturing and installation.</li> <li>• Operational Energy &amp; Water – anticipated energy consumption for heating / cooling, lighting, appliances and potential water usage. What degree of renewability will be part of the planning? How will local water supplies be protected? What level of monitoring will be in place and what enforcement regimes will be applied?</li> <li>• Waste reduction – what efforts are to be made in relation to site waste? How will these be measured and monitored? What enforcement action will be taken for breaches?</li> </ul>
<b>Comment ID</b>	NULLP1125
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Please take this email as my representation against the continuation of the development policy AB2.</p> <p>My overriding view is that the plan for Audley does not respect the nature of the area, the biodiversity and does not justify the encroachment into green areas. There are a large number of brownfield sites around the area that could provide appropriate stock for development.</p> <p>To the key points:</p> <ul style="list-style-type: none"> <li>• Is the plan positively prepared? - based on evidence, this does not appear to be the case. The area has Victorian roads and placing additional HGV traffic seems like a risk increasing measure. It would appear that concessions to business demands / requirements has superseded that of locals (see points below).</li> <li>• Is the plan justified? - there is significant warehousing in the area already, with significant developments in Stoke-on-Trent, Crewe and other nearby locations. A large number of these are looking for occupants, so on the basis of demand, these plans do not form an appropriate strategy. When there is oversupply, the likelihood is that these units will also remain empty.</li> <li>• Is the plan effective? - it is hard to gauge whether the plan will be effective over the delivery period. With the specific points I raise below, it is unclear whether combining commercial and residential developments will deliver the required benefits in the timescales.</li> <li>• Consistent with National Policy? - it is clear that there are reviews relating to the planning laws forthcoming, and it would appear that this development is attempting to preempt any changes. It does not appear consistent with our environmental and biodiversity goals, and seeks to increase the carbon footprint of the area against the backdrop of "potential" employment.</li> </ul> <p>The key challenge in the local plan is that it is not clear that it benefits the local populace. It is clear that the consideration of wellbeing, health and entitlement to peaceful enjoyment of property has not been fully impact assessed.</p> <p>In closing, I have summarised the areas where I believe the plan is deficient and should therefore be withdrawn. Each of these areas should have been addressed ahead of any plan submission such that residents and business could make a fully informed judgement on the impact:</p>
<b>Comment ID</b>	NULLP1129

<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.17
<b>Q6 Details</b>	This should have been as part of the local plan and not be done after planning has been granted. The technology exists to support modelling out the visual impacts, as well as conducting an impact assessment on individuals directly affected by the proposals. Assessment done after the planning grant will be too late.
<b>Comment ID</b>	NULLP1133
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.22
<b>Q6 Details</b>	To what end is this being constructed? It is mentioned, but the outcomes are not documented. Is there an obligation on the developers to fund this effort? Is there an obligation for the developer and occupants to recruit from local talent first?
<b>Comment ID</b>	NULLP1127
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.14
<b>Q6 Details</b>	The number of available public transport bus routes has declined over recent years, and yet we are now saying that there is a budget to provide additional bus routes to support the development. Our child can barely get to college on time with current bus services, but the plan affords additional services to the development. Transport is supposed to be for all, not simply workers hence the term public transport.  Will the funds for car parking be used to fund transport to the site or overall transportation to the Audley area? This needs to be clarified.
<b>Comment ID</b>	NULLP1131
<b>Order</b>	148
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Hoban
<b>Consultee Given Name</b>	Kieran
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.20
<b>Q6 Details</b>	The first point clearly states that there are heritage features on site, yet gives the developers the opportunity to remove, obviate or excavate. It is either heritage or not, and if it is heritage <b>MUST</b> be retained.

<b>Comment ID</b>	NULLP999
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Indurent Strategic Land
<b>Consultee Position</b>	Senior Planning Manager
<b>Consultee Family Name</b>	Holdstock
<b>Consultee Given Name</b>	Damien
<b>Agent Company / Organisation</b>	Planning Prospects
<b>Agent Position</b>	Agent on Behalf of St Modwen Developments Ltd
<b>Agent Family Name</b>	Barnes
<b>Agent Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Representations in relation to draft Policy AB2 are set out in the Statement submitted alongside this form. That Statement lists and is accompanied by a series of 10 Appendices. Detailed representations have been submitted in relation to Policy AB2 (Land at Junction 16 of the M6). Those representations comment at length on the requirement for employment land, and explain Indurent's view that this is understated in the Council's evidence base and the Regulation 19 document, by some margin.</p> <p>Part 2 of draft Policy PSD1 (Overall Development Strategy) appropriately expresses the employment land requirement as a minimum, but for the reasons given in the representations made in relation to Policy AB2 that minimum figure (63ha) is considered to be too low. Just making a single adjustment to address one of the shortcomings in the evidence base (changing the assumed plot ratio from 40% to 35%) this would increase to 72ha, before the other points raised in the representations to Policy AB2 are even considered.</p> <p>Part 3 of draft Policy PSD1 is more appropriately drafted in that it confirms the strategic employment site allocations are intended to, "support a resilient supply of employment land and investment and growth, including serving the wider sub-regional economy", so performing an additional role relative to the basic provision identified in Part 2. Resilience in the supply is indeed important such that a full range of needs can be met over the Plan period. Moreover, the evidence submitted in relation to Policy AB2 identifies the importance of understanding the requirement on a FEMA wide basis, and of rectifying the long-term local weakness locally whereby the larger employment requirements have bypassed Newcastle-under-Lyme due to a lack of sites. That said, it is considered that some further clarification is required to the wording of this part of the draft policy. Amendments to address the points raised above are needed to ensure this part of the Plan is Positively Prepared, providing a strategy which as a minimum will meet the area's objectively assessed needs.</p>
<b>Q7 Modification</b>	The minimum requirement expressed in Part 2 of draft Policy PSD1 should be amended to reflect the detailed evidence presented here in relation to Policy AB2. Part 3 of draft Policy PSD1 should be amended to read, "This will include the allocation of two strategic employment sites that will be allocated in the Plan to support a resilient supply of employment land and investment and growth, including serving the wider sub-regional economy in addition to the minimum requirement identified in Part 2 of this policy:-"
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	The representations made, particularly in relation to draft Policy AB2, are detailed, extensive, and address a range of technical matters. It will assist the hearing process to have participants in attendance able to assist with any explanation that may be required in relation to this or related matters.
<b>Attachments</b>	<a href="#">1364336 Indurent App 6 - 10.pdf</a> <a href="#">1364336 Indurent App 1-5.pdf</a> <a href="#">1364336 Indurent AB2 Reps.pdf</a>
<b>Comment ID</b>	NULLP988
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Indurent Strategic Land
<b>Consultee Position</b>	Senior Planning Manager
<b>Consultee Family Name</b>	Holdstock
<b>Consultee Given Name</b>	Damien
<b>Agent Company / Organisation</b>	Planning Prospects



<b>Agent Position</b>	Agent on Behalf of St Modwen Developments Ltd
<b>Agent Family Name</b>	Barnes
<b>Agent Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Representations in relation to draft Policy AB2 are set out in the Statement submitted alongside this form. That Statement lists and is accompanied by a series of 10 Appendices.</p> <p>1.1 Indurent Strategic Land ("Indurent") have instructed Planning Prospects Ltd ("PPL") to prepare and submit these representations to the Final Draft Local Plan (Regulation 19 stage) Consultation for the Newcastle-under-Lyme Local Plan. The representations are informed by extensive supporting technical work which is set out where relevant in a series of appendices to this document.</p> <p>Indurent is a recently launched developer and operator of industrial and logistics space, bringing together the specialist multi-let industrial property company, Industrials REIT, and logistics developer and manager, St. Modwen Logistics. St. Modwen, as was, engaged very extensively throughout the emerging plan process to date, and that engagement is continued here under the Indurent banner.</p> <p>St. Modwen had extensive land ownership and development interests across the Staffordshire area and a longstanding and extensive record in successfully bringing forward major schemes in this part of the West Midlands, with a particular emphasis upon economic development and regeneration projects. That mantle has now been taken up by Indurent. These representations support and promote aspects of those interests in the manner explained below.</p> <p>In particular, a specific requirement for large scale, logistics focused, employment development with immediate access to the Strategic Road Network has been identified, within the District. This is now recognised in the Regulation 19 Plan through draft allocation Policy AB2 which identifies land at Junction 16 (J16) of the M6 for employment development. The representations set out here are prepared in that context, focusing on draft Policy AB2.</p> <p><b>PURPOSE OF REPRESENTATIONS</b></p> <p>Fundamentally, Indurent support strongly draft Policy AB2 and the allocation of land at J16 for employment development.</p> <p>The most suitable direction and option for growth if the clearly identified need for large scale, logistics focused, employment development with immediate access to the Strategic Road Network is to be met, has been addressed at length through previous Local Plan consultation events. Specifically, this comprises development to the south east of J16, extending to almost 80ha of land controlled by Indurent, and capable of accommodating approximately 220,000 sq m of employment accommodation, including multiple buildings in excess of 30,000 sq m, an individual building significantly larger than 30,000 sq m, alongside other buildings of at least 10,000 sq m, plus ancillary accommodation. This is now allowed for by draft Policy AB2 and Indurent support that.</p> <p>However, the soundness of the emerging Plan that is being considered at this (Regulation 19) stage relies on tests including whether it is "Positively Prepared", "Justified", "Effective", and "Consistent with National Policy". It is considered that there are elements of draft Policy AB2 which in their current form undermine these requirements. So, and again notwithstanding the strong and overarching support for draft Policy AB2, it is considered that changes to this part of the Plan are needed to make it sound. This matter is addressed in this report.</p> <p>Previous responses to consultation events should be read alongside the submissions made in this report to gain a full understanding of Indurent's overall position.</p> <p>See attached representations.</p> <p><b>SUPPORT FOR POLICY AB2 IN PRINCIPLE CONTEXT</b></p> <p>The case for the allocation of land at J16 for to meet a requirement for strategic employment development has been advanced over an extended period through the plan making process. The evidence assembled through that period up to and including the Regulation 18 stage is extensive and convincing.</p> <p>An overview of the need to provide strategic employment land was set out in the representations made by St. Modwen (as was) to the Regulation 18 consultation. An extract from those representations addressing this point is provided here at Appendix 1.</p> <p>The St. Modwen evidence at Regulation 18 stage included a "Big Box Market Statement" prepared by JLL focusing on the need for sites to accommodate the largest employment requirements. That was first prepared in February 2018 and updated in May 2019 and again in December 2021; the 2021 update is provided here at Appendix 2. The evidence also included a further exercise undertaken by Savills in August 2023 provided here at Appendix 3. JLL and Savills are both leading international real estate advisors.</p> <p>The JLL and Savills reports are complementary exercises representing a well-considered and extensive evidence base which alongside the Council's evidence base is strongly in support of development of the type anticipated at J16.</p> <p>The Regulation 18 representations also dealt with "exceptional circumstances" and the justification for removing the land from the Green Belt. A note of St. Modwen's position on this was submitted alongside those representations and is also provided here, at Appendix 4. This observes that if this matter is not properly dealt with the emerging Plan may be found to be "unsound". Councils should act to identify and then meet development needs. In this case the evidence identifies a specific and increasingly acute need and that this can only be met through the release of Green Belt land. The "exceptional circumstances" lie within, and the matter goes to the ability of the emerging Plan to be found "sound"</p> <p>This extensive effort has now yielded a position whereby the "Vision for the Borough" in the Regulation 19 document appropriately includes (paragraph 4.1) that: "By 2040...We will have delivered or on the journey to delivering a sub-regional exemplar business park at Junction 16 of the M6 Motorway to support</p>

sustainable economic growth and take advantage of the accessibility of the Borough to the wider strategic transport network." The associated "Strategic Objectives for the Borough" include (paragraph 4.5, emphasis added) to; "Diversify the Borough's employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, supporting technology, and the green economy to generate more skilled jobs for local people." In seeking to deliver this Vision and Objectives site AB2 "Land at Junction 16 of the M6" is allocated, "as a strategic employment site serving the employment needs of the Borough and wider sub-region" (paragraph 13.12). This allocation is supported by Indurent. The most recent evidence around employment land and the requirement for the allocation is discussed below. Draft Policy AB2 provides a series of criteria that proposals for the site must attend to. These are also considered below.

#### THE NEED FOR EMPLOYMENT LAND

The most recent documents added to the Council's evidence base dealing with the need for employment land include the Housing and Economic Needs Assessment Further Update ("HENAFU") (Turley, April 2024), and Strategic Employment Sites Assessment Update ("SESA") (Aspinall Verdi, June 2024). Indurent have also instructed Savills to update the work they prepared in 2023 to support the Regulation 18 representations. This update is provided in the Industrial & Logistics ("I & L") Needs Assessment Addendum ("ILNAA") (Savills, October 2024) attached here at Appendix 8.

The ILNAA sets out a review of the evidence base, including the HENAFU and SESA. It explains why growth in the Industrial and Logistics Sector is important, and provides an update in terms of market dynamics in that sector. It places the requirement for employment land arrived at through the Council's evidence base in the context of an alternative assessment prepared by Savills which seeks to overcome some of the methodological shortcomings in that work. It assesses the economic benefits and social value expected to be generated by the development of the site.

Bringing these strands together the ILNAA concludes:

It is important that the I&L sector's growth is facilitated. It provides better paid jobs compared to the national average across a diverse range of professions. The diversity of occupations has been increasing which will enable the sector to play a key role in re-employing people that have lost jobs in other sectors of the economy.

Savills estimate the FEMA's I&L demand to be 22.3 ha per annum, rising to 24.8 ha per annum including an e-commerce uplift. This is higher than the combined total of the Newcastle-under-Lyme HENAFU and Stoke-on-Trent HENAU, which produce a range of between 6.0 to 18.0 ha per annum. Savills' demand estimates take a market signals approach, and supplement the econometric approaches undertaken by the evidence base to provide a complete picture of future demand.

Consistent with Savills' analysis, the review of market indicators in the SESA also indicates a supply-constrained market, evidencing low availability rates, rental growth, and demand exceeding supply.

The SESA points to the immediate market demand for well-located, high-quality sites along the M6 Corridor between Warrington and the Black Country. The Newcastleunder- Lyme and Stoke-on-Trent FEMA is competing with locations in the North West and West Midlands for this investment, and therefore the Council needs to make sure that they have a pipeline of new, well-located developments coming forward, otherwise occupiers will go elsewhere.

Savills conclude that the site is ideally placed to help cater for the strong, unmet demand in the sub-region, in a prime location adjacent to the nationally significant M6 and A500. This is consistent with the findings of the SESA, which also concludes that there is a need for two Strategic Sites in the new Plan, inclusive of the subject site.

Key benefits arising from development of the site include approximately 2,690 – 3,720 on-site (gross, direct) operational jobs, between £104.3 - £211.4 million in GVA, and an estimated £21.1 million of social value.

A further point on the interpretation of the requirement for employment land also arises from the Savills report (paragraph 3.4.25 et seq.). The Council's evidence base uses a plot ratio of 40%, meaning the 220,000 sq m of floorspace identified for site AB2 equates to 55ha of land allocated to accommodate the buildings plus access, drainage, yard space, Green Infrastructure and so on. Savills consider a plot ratio of 35% is more realistic and using that figure 220,000 sq m of floorspace would equate to a requirement for about 63ha of land.

Site AB2 extends to 78.31ha, but this should not be understood as equivalent to that amount of employment land in Plan terms. As above, in the approach taken by the Council the 220,000 sq m of floorspace identified in the policy reflects an employment land provision of 55ha. It is instructive, though, to consider the plot ratio that would be achieved on site AB2. With 220,000 sq m delivered on 78.31ha of land this would equate to a coverage of 28%. This is markedly lower than the ratio assumption made through the Council's evidence, and also lower than the ratio assumption considered more appropriate by Savills. Essentially this means that considerably more of this site (some 15 – 23ha more depending on the assumption made) will be free from buildings than is typically the case for major I & L schemes, and left available for extensive Green Infrastructure. This is considered appropriate given the countryside and Green Belt setting of the site.

In terms of the relevance for the emerging Plan and draft Policy AB2 the ILNAA offers very clear, additional, evidence that this allocation is needed, specifically to meet a particular requirement for strategic Industrial and Logistics land and more generally to contribute towards a requirement for employment land in Newcastle-under-Lyme and the wider FEMA. If the allocation is not made the need will not be met and the Plan will be unsound.

#### POLICY AB2 CRITERIA

Over a period of years the (now) Indurent team have comprehensively assessed site AB2 to understand how strategic employment development can be delivered there successfully, engaging extensively with consultees where appropriate. Drawing on that experience, and generally, having regard to the site specific criteria provided by draft Policy AB2 the following observations are made. Highways and Access Criterion 2 requires safe and convenient access to be formed onto the A500. An update on progress with this (and a range of other highways points) was provided to the Council in a Technical Note dated 24th May 2024. That Note (provided here at Appendix 5) shows the preferred access design which has been subject to safety assessment (shown to be acceptable) and modelling (shown significantly to reduce

queuing and delay as a benefit of development). The safety assessment and modelling have been approved by National Highways.

2.18 Criterion 2 also requires an emergency access from Barthomley Road to be delivered in Phase 1 of the development. This is considered further in Section 3 below.

2.19 The requirement for off-site highways mitigation is set out in criterion 7. The Note (Appendix 5) explains the agreement reached with the national and local highway authorities that assessment need deal only with the site access and J16. As discussed above, the proposed design in this regard has been found to be acceptable (indeed beneficial).

Sustainable travel is considered in criterion 13 of the draft policy, to be secured via a travel plan. The Note (Appendix 5) explains how amendments to bus services and use of Demand Responsive Transport will provide a public transport solution for the site, and gives examples of where such measures have successfully been used elsewhere. Meetings have been held with both local bus companies in the area (D&G and First Group). Both companies expressed their enthusiasm in directing their existing bus services to the site, through extension or partial diversion. The Note also summarises the solution anticipated in terms of supporting active travel through the provision of cycling infrastructure and other interventions.

It should also be noted in this regard that the evidence base published alongside the Regulation 19 Plan includes a Strategic Transport Assessment. The outcome of that assessment includes the conclusion that the only mitigation needed for the development of site AB2 is enhanced bus services. As above, the provision of such services has already been anticipated and allowed for by Indurent.

#### HGV Parking

Criterion 3 sets out the requirement for secure, high quality HGV parking with associated facilities. The existing A500 lay-bys across the site frontage are well used by HGVs for overnight parking. However, the layout of the lay-bys on both sides of the A500 is significantly below the required standards with no welfare facilities for users and no security.

There is also a critical and well evidenced shortage of lorry parking in the area. In considering a lengthy "London to Scotland West" route along the M40, around Birmingham and up the M6 the September 2023 Lorry Parking Demand Assessment prepared by AECOM for National Highways identifies Newcastle-under-Lyme as the worst area in terms of unmet demand for lorry parking. Lorry parking issues in this Authority are regarded as "severe", meaning National Highways' position is that the Local Plan must acknowledge and address this issue.

The allocation of the Site presents an obvious opportunity to provide a secure, high-quality lorry park off the A500 as part of a development. Design work completed to date identifies a plot of nearly 3ha for this purpose at the northern end of the site next to the entrance, capable of accommodating 200 HGVs. This would be a further important benefit of development here, meeting a clear need. Such a lorry park would provide some free short stay parking for all vehicles, to compensate the loss of non-emergency stopping provision offered by the existing lay-bys, and would offer driver welfare facilities. A lorry park of this nature would be an important benefit from development of the site, also noting the wellpublicised difficulties in HGV driver recruitment and retention caused in part by a lack of good quality secure and well serviced facilities. This is an important point, and one that is recognised in National Policy. The NPPF states (paragraph 113) that; "Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use." There is a need significantly to upgrade the existing lay-by provision on the A500, better serve an area along the M6 corridor where the shortage of HGV parking is severe, and deliver this in a secure, high-quality manner with good facilities. The provision of this as required by draft Policy AB2 and as anticipated by the Indurent proposals for the site represents a key benefit of the allocation here.

#### Sustainable Development and Energy

Draft Policy AB2 includes requirements around the inclusion of a primary sub-station and provision of a sustainable energy strategy (criterion 4), provision for solar technology and the potential for a "smart grid" (criterion 5), and achieving a rating of at least BREEAM Excellent (criterion 6).

The approach to these criteria will evolve as any scheme is finalised but in terms of activity to date substantial progress has been made to secure the required power to service the site. In late 2023 St Modwen (now Indurent) signed an order with National Grid Electrical Distribution to secure the required import capacity. Initial payments were made and substantial further payments to NGED are scheduled to support this.

Further to Indurent's acceptance of this power provision order NGED have been engaged in relation to the scheme's effect on the "upstream" National Grid Transmission network. Indurent has paid fees associated with being integrated in the National Grid Transmission Network Review. Work is also being progressed around the detail of routing power from the relevant NGED primary substation.

The current indicative layout for the site includes land earmarked for the required primary and secondary substations. Land is also identified for a foul pumping station and a hub building providing ancillary accommodation for the main employment function of the wider development.

Indurent also commissioned an industry leading expert in solar provision to complete a feasibility exercise on establishing the site as a truly integrated 'SMART Grid' with enhanced solar offering above their base specifications. The outcome of this exercise was positive and so further work is now under way to understand delivery and how reduced reliance on the national grid and maximised onsite solar power generation can best be achieved.

As a matter of course Indurent's base specification for strategic employment development of this type includes achieving BREEAM Excellent. Indurent also commissioned the preparation of a strategy to understand how an uplift of BREEAM rating from Excellent towards Outstanding can be achieved. This highlights a number of areas where credits could be obtained to enhance development beyond the Excellent threshold, including for example in relation to construction, handover, aftercare, energy and water use and monitoring, material sourcing and waste management.

#### Amenity

The extent of any requirement to control noise and traffic impacts identified by criterion 8 is reduced by the existing background conditions created by the M6 and A500, and also the limited number of dwellings in close proximity to the site. That said, the approach taken to landscaping (discussed below) includes extensive landscaped areas around the edge of the site to separate noise sources from sensitive receptors. Moreover, the main estate road is planned to run down the western side of the site, so alongside the M6.

The single main point of vehicular access anticipated from the north means that traffic will use the A500 and M6 and not the local road network. That said, the Note provided at Appendix 5 identifies the potential for implementing a "Traffic in Villages" approach, combined with the speed reduction and advanced signage measures to be delivered as part of the active travel strategy, further to robustly deter scheme traffic using local roads.

**Landscape and Open Space**  
A landscape-led approach to the development of the site is required (criterion 9), with the retention and enhancement of tree and hedgerow provision also sought (criterion 10). The approach as currently envisaged in this regard is illustrated in the Green Infrastructure Strategy included here at Appendix 9. The Strategy is informed by a suite of appraisals including landscape, ecology, arboriculture, design, heritage, transport and drainage. It arrives at an approach based upon an extensive, integrated and connected network of high quality and thoughtfully designed strategic open space through multiple Green Infrastructure corridors.

The Strategy assesses the current indicative layout to calculate that there would be 3.75km of retained and enhanced hedgerows and tree belts on site, 12Ha of proposed woodland and scrub, and 5.8km of proposed hedgerow. Further enhancements and new provision are also identified off-site.

Criterion 15 seeks the provision of strategic open space within the northern centre of the site, including the whole of the area in between Public Footpaths Audley 9 and Audley 22. This is considered further in Section 3 below.

#### Public Rights of Way

Criterion 14 calls for the enhancement of Public Rights of Way (PROW) and Green Infrastructure Network alongside new walking and cycling routes on the site. The Green Infrastructure Strategy (Appendix 9) notes that the PROW in the southern part of the site are better used and more accessible; they will be retained and enhanced within strong green corridors. Those in the northern part of the site are much less well used but will be enhanced and either retained (PROW Audley 9) or diverted (Audley 8) through a further green corridor.

The current indicative layout also shows a network of additional potential pedestrian and cycle ways throughout the site further enhancing the ability to move across and within the site and linking up the formal PROWs. The Green Infrastructure Strategy states that as currently drawn these proposed recreational routes would extend to 4.8km, with 1.5km of existing PROW within the site retained and enhanced.

This should also be understood alongside previous analysis prepared and submitted as part of the Regulation 18 consultation, and provided again here (Appendix 6), to consider how Green Belt mitigation can be achieved. This identifies a series of mitigation measures that could be achieved through a well-planned and comprehensive green infrastructure framework within and around the Site, but it also reports on an audit undertaken to identify opportunities to improve pedestrian access into the surrounding area. Locations within and beyond the site are identified where enhancements secured through planning can be made.

#### Heritage

Criteria 11 and 12 are concerned with heritage, seeking a sensitive response to the setting of nearby assets, consideration of the HIA for the site prepared by the Council, and the retention or evaluation of assets within the site as appropriate.

An archaeological and heritage overview was undertaken of the Site to identify historic environment assets, assess their significance and to determine whether development would result in unacceptable harm to the heritage assets. This is attached to the Technical Note provided here at Appendix 7, which summarises matters from a heritage perspective.

This material was also submitted at the Regulation 18 stage.

From this work, any buried assets are considered to be of low local significance and do not comprise an impediment to the development of the site.

In terms of built heritage, Brook Farm within the site is of local significance. It is assessed in the further report attached to the Technical Note at Appendix 7. The observations there include that the Brook Farm farmhouse and associated outbuildings are of low local value. Designated built heritage assets within the vicinity of the site are separated from it and are not considered to be an impediment to development.

Overall, there are no known archaeological constraints within the site which would make development unacceptable as a matter of principle and which could not be mitigated. The loss of Brook Farm, an unlisted farmstead is considered to be of only local significance. Visual effects to the significance of the designated assets through changes to their setting are considered to be on the whole low and would not result in an unacceptable level of harm.

The Council published a Heritage Site Assessments document as part of their evidence base for the Regulation 19 consultation. The conclusions of this work overall point to the site having medium sensitivity. Recommendations are made in terms of mitigating the effect of development on heritage in a straightforward manner, and with no suggestion that the site cannot be developed appropriately from a heritage perspective.

#### Drainage

The open space strategy and indicative layout proposals discussed above recognise and incorporate the water course running through the centre of the site, and anticipate extensive surface level surface water storage throughout as part of a sustainable drainage system. This in turn provides opportunities for the landscape, amenity and biodiversity enhancements sought by criterion 16.

#### Utilities

Criterion 19 is concerned with utilities (principally drainage). It is expected that the site will be drained following sustainable principles relying extensively on surface level storage for surface water drainage. From engineering work to date the proposed levels across the site have been designed to ensure



exceedance flood flows are directed away from buildings. Any flooding in the roads will be conveyed within the carriageway where it will either flow within the channels, re-entering the system at a downstream gully or ponding in low points until capacity becomes available in the downstream network. In some places exceedance flows will be conveyed overland across soft landscaping towards the proposed attenuation features or watercourse. A foul pumping station will be required to discharge foul flows from the site to the public foul sewer network; as discussed above space for this has been allowed for in the emerging design.

Criterion 20 requires that development is kept an appropriate distance from the gas distribution pipeline crossing the site and any other infrastructure. The Indurent team have a full understanding of all such infrastructure and the indicative proposals are designed to take it into account.

Other

Draft Policy AB2 also seeks to secure an Employment and Skills Plan (criterion 17) and management and maintenance measures (criterion 18). These provisions can be secured in a very straightforward manner through the development management process. Indeed, in terms of criterion 17 a Framework Employment & Skills Plan has already been prepared and shared with the Council (Appendix 10) to explain the approach that could be applied in this regard. As such, it is considered that there is a clear route for the matters raised in the draft Policy AB2 criteria to be addressed through the development of the site.

#### SUMMARY

The case for the allocation of land at J16 for to meet a requirement for strategic employment development has been advanced over an extended period. The evidence assembled in that regard up to and including the Regulation 18 stage is extensive and convincing. A clear case has also been made to justify removing the land from the Green Belt. The position arrived at now where the Vision, Strategic Objectives and Policy of the plan support an allocation at J16 is an appropriate one.

The need for employment land to support an allocation has been revisited here in the context of the Council's latest evidence and updated work undertaken on behalf of Indurent. This finds that the need is greater than that suggested by the Council's evidence base, and that the site is ideally placed to help cater for the strong, unmet demand in the sub-region, in a prime location adjacent to the nationally significant M6 and A500.

The draft allocation Policy AB2 includes a range of site specific criteria to be satisfied, concerned with highways and access, HGV parking, sustainable development and energy, amenity, landscape and open space, public rights of way, heritage, drainage, utilities, and other matters. Design work undertaken over an extended period shows that each of these can be addressed satisfactorily such that a successful scheme can be delivered here.

#### REASONS FOR UNSOUNDNESS

Section 2, above, explains why, fundamentally, Indurent support strongly draft Policy AB2 and the allocation of land at J16 for employment development. In most respects the policy is sound. However, there are a small number of points it is considered should be addressed to ensure it is fully sound. Those points are identified here. The changes then suggested to remedy the issues identified and make this part of the plan sound are set out in Section 4, below.

#### REASONS

##### i) Opening Text

The opening text of the policy includes, "The site extends to circa 80 hectares and is allocated for uses including 22 hectares (circa 220,000 sqm of floorspace) of employment land." For this part of the Plan to be positively prepared it must convey effectively how it will meet the identified need. It is considered that to be effective this wording as currently framed – with the allocated floorspace first expressed unconventionally in hectares – should be rephrased, ensuring its intention is entirely clear.

##### ii) Criterion 2

There is a requirement in Criterion 2 for an emergency access via Barthomley Road to be delivered as part of phase 1 of the development. Barthomley Road is at the southern end of the site, and it is likely that the development will proceed from north (where the main vehicular access is required) to south. An emergency access here would not serve any useful purpose as part of any first phase; it is not justified. It is considered that this criterion should be amended to make reference to the provision of an emergency access in accordance with phasing to be agreed.

##### iii) Criterion 9

Criterion 9 includes the requirement for, "buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area." Recognising that the proposed allocation is for strategic employment land to include very large buildings it is likely that, to some degree, the buildings will be visually intrusive where they are seen. The wording as currently framed undermines the deliverability and hence effectiveness of the allocation. The requirement should not be to avoid intrusiveness, but rather that any such effect should not be mitigated and not then be unacceptable, and the wording should be amended accordingly.

##### iv) Criterion 15

There is a requirement (criterion 15) for, "Provision of strategic open space within the northern centre of the site, including the whole of the area in between Public Footpaths Audley 9 and Audley 22 to be delivered as part of development Phase 1." It is understood that this requirement stems from the Council's desire to mitigate the impacts of the development of the site. Indurent share the Council's view that mitigation should be pursued. However, it is considered that this very specific policy requirement is not justified. It does not represent the most appropriate strategy for the site and is inconsistent with delivering the best outcome here, which might be achieved through the provision of open space in other ways. It does not appear that the preservation of this area is based on any particular evidence as to why this specific parcel should not be developed. Rather, it seems to stem from a general sense that provision of appropriate open space is necessary – a view which is shared by Indurent. The better approach is that the detail of how that is achieved should be based on careful and thoughtful analysis of the site. To that end the Green Infrastructure Strategy (Appendix 9) explains that there is no discernible logic to the restriction proposed for this land. Development here would sit on low-lying land that is not widely visible from the surrounding landscape, and would be well contained by proposed GI. The M6 is a

	<p>significant intrusive feature running alongside this area and it already contains built development. The majority of the area is of limited nature conservation value; existing field hedgerows present here are also of low quality. Notable features of value are restricted to tree belt along the brook and vegetation by the escarpment, and these are retained by the Green Infrastructure Strategy. Leaving it entirely as open space would risk creating a disjointed development.</p> <p>The Green Infrastructure Strategy explains that the preferred approach would be to provide open space on part of this land as part of a high quality and extensive approach to distributing GI across the site as a whole. Substantial corridors of open space, broadly centred upon the brook by Public Footpath Audley 9 and the escarpment by Public Footpath Audley 22 would create opportunities for a range of environmental enhancements as envisaged within the Strategy.</p> <p>The proposed strategy is explained in section 4 of the document. A comprehensive, sitewide approach to open space provision is offered, with a multi-functional Green Infrastructure framework to provide a wide range of environmental enhancements. Proposed Green Infrastructure would create broad swathes of open space, wrapping around development and permeating through central parts of the site. This is expressed primarily through a series of five "GI Corridors."</p> <p>As envisaged in the Strategy an extensive strategic Green Infrastructure offer would encompass approximately 29Ha which equates to 37% of the total site area. With on-plot provision as anticipated in the current indicative layout that would increase to approximately 42%. The Green Infrastructure Strategy also explains how the site will provide in the order of 15 – 23Ha of landscaping in excess of that which might routinely be associated with employment development at this scale.</p> <p>The Green Infrastructure Strategy represents an appropriate response in mitigating the impacts of development and offering very considerable enhancement. In this context, to ensure that the best possible solution is achieved criterion 15 should be expressed more generally in terms of what it is seeking to achieve across the site, rather than limiting itself to one area.</p> <p>v) Criterion 17</p> <p>The requirement in criterion 17 is for an Employment and Skills Plan to be secured, specifically, through a S.106 agreement. The national policy position (NPPF paragraph 55) is one where matters capable of being dealt with via condition, rather than obligation, should be so addressed. To avoid inconsistency with national policy it should not be specified that this requirement is dealt with via S.106. There might be reasons why an obligation is necessary to deal with the point, but equally it might be dealt with via condition. There is no need for the policy to dictate the mechanism.</p> <p>SUMMARY</p> <p>Indurent support strongly draft Policy AB2 and the allocation of land at J16 for employment development. However, there are a small number of points it is considered should be addressed to ensure it is sound. These relate to the opening text of the policy and then its criteria 2, 9, 15 and 17.</p>
<b>Q7 Modification</b>	<p>Section 3, above, identifies a small number of points to be addressed in relation to draft Policy AB2 to ensure it is sound. The changes suggested to remedy the issues identified and make this part of the plan sound are set out here.</p> <p>MODIFICATIONS</p> <p>i) Opening Text</p> <p>To clarify the opening text to Policy AB2 in terms of the effect the allocation is intended to have it is suggested it is amended to include, "...allocated for uses including circa 220,000sq m of floorspace for employment use. Employment will..."</p> <p>ii) Criterion 2</p> <p>The main access to the site should be provided within the first phase of development, and the emergency access should be provided to suit the phasing of the development of the site as a whole. Criterion 2 should be amended to read, "Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 to be delivered in Phase 1 of the development, with emergency access via Barthomley Road to be delivered in accordance with phasing arrangements for the development of the site as a whole to be agreed with the Council."</p> <p>iii) Criterion 9</p> <p>For clarity and effectiveness Criterion 9 should be amended to include, "designed to ensure they are not unacceptably intrusive in significant views..."</p> <p>iv) Criterion 15</p> <p>To secure the most appropriate strategy for the site and the most successful outcome for the allocation, the area currently specified by criterion 15 should not be excluded from development. This criterion should be amended to read, "Provision of strategic open space within the northern centre of the site, including a green corridor encompassing Public Footpath Audley 9 and the adjacent watercourse to be delivered as part of development Phase 1, and also as part of a comprehensive site wide phased approach to high quality open space and Green Infrastructure provision."</p> <p>v) Criterion 17</p> <p>To ensure compliance with national policy criterion 17 should not specify the mechanism through which the Employment and Skills Plan is to be secured. The concluding words of the criterion ("secured through a S.106 agreement") should be deleted.</p> <p>SUMMARY</p> <p>Modest changes are suggested in relation to the opening text of Policy AB2 and then criteria 2, 9, 15 and 17. The implementation of these changes will ensure this part of the Plan is sound.</p> <p>SUMMARY</p> <p>Indurent have instructed Planning Prospects to prepare and submit these representations to the Final Draft Local Plan (Regulation 19 stage) Consultation for the Newcastle-under-Lyme Local Plan. The representations are informed by extensive supporting technical work which is set out where relevant in a series of appendices to this document. This document deals solely with Indurent's response to draft Policy AB2. Indurent's comments on other parts of the Regulation 19 Plan are set out separately.</p> <p>The case for the allocation of land at J16 for to meet a requirement for strategic employment development has been advanced over an extended period. The evidence assembled in that regard up to and including the Regulation 18 stage is extensive and convincing. A clear case has also been made to justify removing</p>



	<p>the land from the GreenBelt. The position arrived at now where the Vision, Strategic Objectives and Policy of the plan support an allocation at J16 is an appropriate one.</p> <p>The need for employment land to support an allocation has been revisited here in the context of the Council's latest evidence and updated work undertaken on behalf of Indurent. This finds that the need is greater than that suggested by the Council's evidence base, and that the site is ideally placed to help cater for the strong, unmet demand in the sub-region, in a prime location adjacent to the nationally significant M6 and A500. The draft allocation Policy AB2 includes a range of site specific criteria to be satisfied, concerned with highways and access, HGV parking, sustainable development and energy, amenity, landscape and open space, public rights of way, heritage, drainage, utilities, and other matters. Design work undertaken over an extended period shows that each of these can be addressed satisfactorily such that a successful scheme can be delivered here.</p> <p>Indurent support strongly draft Policy AB2 and the allocation of land at J16 for employment development. However, there are a small number of points it is considered should be addressed to ensure it is sound. These relate to the opening text of the policy and then its criteria 2, 9, 15 and 17.</p> <p>Modest changes are suggested in relation to the opening text of Policy AB2 and then its criteria 2, 9, 15 and 17. The implementation of these changes will ensure this part of the Plan is sound.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	The representations made, particularly in relation to draft Policy AB2, are detailed, extensive, and address a range of technical matters. It will assist the hearing process to have participants in attendance able to assist with any explanation that may be required in relation to this or related matters.
<b>Attachments</b>	<a href="#">1364336 Indurent AB2 Reps.pdf</a> <a href="#">1364336 Indurent App 1-5.pdf</a> <a href="#">1364336 Indurent App 6 - 10.pdf</a>
<b>Comment ID</b>	NULLP1001
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Indurent Strategic Land
<b>Consultee Position</b>	Senior Planning Manager
<b>Consultee Family Name</b>	Holdstock
<b>Consultee Given Name</b>	Damien
<b>Agent Company / Organisation</b>	Planning Prospects
<b>Agent Position</b>	Agent on Behalf of St Modwen Developments Ltd
<b>Agent Family Name</b>	Barnes
<b>Agent Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Representations in relation to draft Policy AB2 are set out in the Statement submitted alongside this form. That Statement lists and is accompanied by a series of 10 Appendices. Draft Policy PSD4 is concerned with Development Boundaries and the Open Countryside. Read as a whole it establishes the different approach that will be taken within settlement boundaries compared with open countryside. However, as currently phrased it creates the potential for confusion and conflict in circumstances where some allocated sites are (by draft Policy PSD4 definition) within open countryside, but not subject to the associated limitations embodied within this part of the Plan. This serves to undermine the effectiveness of the Plan.</p>
<b>Q7 Modification</b>	A further type of allowable development should be added to Part 3 of Policy PSD4 to read, "Development in accordance with the allocations made in this Plan."
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	The representations made, particularly in relation to draft Policy AB2, are detailed, extensive, and address a range of technical matters. It will assist the hearing process to have participants in attendance able to assist with any explanation that may be required in relation to this or related matters.
<b>Attachments</b>	<a href="#">1364336 Indurent App 1-5.pdf</a> <a href="#">1364336 Indurent AB2 Reps.pdf</a> <a href="#">1364336 Indurent App 6 - 10.pdf</a>

<b>Comment ID</b>	NULLP368
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Holland
<b>Consultee Given Name</b>	Nigel
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.42
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	My view is that this site is a prime location and a logical choice for development considering its setting within the village of Audley. The site is already surrounded on the majority of its boundary by housing and if developed the site would not go beyond the overall boundary of existing housing. The only concern that I have is that the council have reduced the number of plots on the site to 33 and I feel that by doing this the potential of the site has been compromised. It has been demonstrated to me by several developers that the site could accommodate 42 to 52 plots and still provide generous areas of open space and green areas. Please consider these comments before the final decision is reached.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6386406
<b>Attachments</b>	<a href="#">Site AB15.pdf</a>

<b>Comment ID</b>	NULLP1387
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hollingsworth
<b>Consultee Given Name</b>	Fiona
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1445
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hollingsworth
<b>Consultee Given Name</b>	Fiona
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

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The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

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The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

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<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1124
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Hood
<b>Consultee Given Name</b>	Gerone
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I am local [redacted by admin] of The Rigger, N-U-L, I have seen and experienced the Importance this venue is to the community. It's been a staple of the community in general and the music lovers community and culture since the 70s when it was called The Bandstand!. The possibility of Losing it due to increased noise complaints would have a knock on devastating impact on [redacted by admin], the local economy and the town's cultural scene . The Rigger is not only a venue for live music - it's a cultural icon! Everyone knows or has heard of the rigger! I'm a barman and I've served hundreds of people who have told me they have been coming for 20-30 years+. It's a thriving central hub, gathering place, a platform and stepping stonefor local talent, and a key contributor to Newcastleunder-Lyme's identity as a cultural hub.I urge and implore the planning team to include stronger noise mitigation procedures and measures that specifically target to protect The Rigger. Including specifically mentioning the venues cultural significance and the inclusion of the Agent of Change principle in the 'Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses'under Policy TC22 ensuring that the responsibility for mitigating potential noise issues is completely on the developers not the existing businesses and culturally significant venues. Without these changes, The Rigger could face unfair and unsustainable restrictions due to increased noise complaints that would limit its ability to operate and serve the community as it has been since the 70s!.</p> <p>Thank you for you time and consideration in reading my concerns. I hope the planning team will take the important andnecessary steps to safeguard The Rigger and that it continues to shine as a cultural beaconIn our town and Staffordshire.</p>



<b>Comment ID</b>	NULLP1437
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hood
<b>Consultee Given Name</b>	Pauline
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1438
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hood
<b>Consultee Given Name</b>	Pauline
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

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<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1393
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Hood
<b>Consultee Given Name</b>	Valerie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
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<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1454
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hood
<b>Consultee Given Name</b>	Valerie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
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The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1122
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.</p> <p>Plan: AB2 I OBJECT TO THIS PLAN. The AB2 proposal raises many concerns for me as a local resident and a person who enjoys the countryside afforded to us in the Audley Parish. My partner and I use the local roads in this area for walks, runs and cycles. One of the greatest assets in this area is the long sprawl of countryside, creating the rural landscape we all love. This development alone would rob our area of the title 'rural' as the stolen greenbelt land would be lost forever to the needless development of even more industrial units, which if the sites in Alsager and Tunstall are anything to go by, will remain unoccupied for years. We regularly drive past empty, derelict brownfield sites on the A500. How can the local council consider tearing up greenbelt land when there are acres and acres of already developed, ready to change brownfield sites? By developing on this site, currently undeveloped land which is an extremely valuable natural carbon store, there will be an increase in carbon emissions. Many of the hedgerows that will be removed in this plan are protected on the government website, due to the range of tree species.</p> <p>From the local plan the increase in local employment and boost to the local economy has been noted as a reason for this proposal. Knowing the local area well, I cannot state strongly enough that this will not be the case. Local services will not be used by the workers on this site, as the local shops and amenities are too far away to walk to. There are no longer any bus regular bus routes that connect Audley and Newcastle, so there will be no increase in public transport use. Due to the challenging terrain, steep banks and tough climbs on the roads from Newcastle, cycle users will not commute to the site. As someone who has cycled and ran on every road in the parish and wider borough, this is not a viable benefit. Therefore, the only way the site will be accessed is by car, increasing the traffic through old, pot-holed and already busy roads in the local villages. The roads through the village, particularly in Audley, have been riddled with pot holes for years. If the council cannot look after the road surface now, with the current level of road use, how can they guarantee a good quality of road surface with increased traffic from all sorts of vehicles if these plans go ahead?</p> <p>The jobs offered by this site will not go to our local residents. As the site is right on the edge of the borough, and the St Modwen website notes that jobs can be accessed one hour commuter distance, the jobs will be open to an estimated population of 9 million people, a small percentage of those coming under the umbrella and of Newcastle-under-Lyme. So, the suggestion that this site will aid the employment and economy of the local area is just not true.</p> <p>I wish the local councillor to remove sites AB12, AB2 and AB33 from the local plan.</p>
<b>Comment ID</b>	NULLP1120
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.</p> <p>Especially AB12, this should not be considered for housing as an area of greenbelt, and the local plan should place greater emphasis on developing brownfield sites in high density areas, like vacant town centre buildings, rather than extending the sprawl of properties on already crowded main roads through our villages.</p> <p>On daily walks through the parish, and sitting in our garden, we are inundated with birdsong, the sounds of nature and free wildlife. Especially in the evenings, owls can be seen and bats flap freely through the air. Destroying our rural landscape will tear away the identity this parish has cultivated.</p> <p>PLAN: AB12 I OBJECT TO THIS PLAN. We moved into our house (redacted by admin) The blind bend coming down the bank (redacted by admin) causes a daily issue leaving our drive and turning right towards Bignall End, or left towards Audley. We have to wait, with our car window down, to have a chance to hear if a vehicle is coming down the bank. We have had a number of near misses. The current level of traffic on this road, and the number of illegally parked cars means that leaving our drive safely is a challenge. Measures are required to leave the drive safely. Illegally parked cars have been reported to the police and council. See attached images for the current level of cars parked illegally and the level of difficulty we have exiting our drive safely.</p>

	<p>When reading the local plan, and finding that the proposed entrance to the AB12 site would be placed in the middle of this blind bend, my thoughts went straight to the safety of road users and the increase of traffic down an already busy road. The placement of the entrance will mean anyone leaving the site will have no view up or down the bank, due to the parked cars and level of traffic. The access road suggested does not appear wide enough to support safe entrance or exit from the site, and the access road cannot be widened due to the houses directly adjacent. What if an ambulance needs to access the houses, but due to the small access road and increase in local traffic, it cannot navigate the bottle neck of Ravens Lane? Take into account that Ravens Lane is also a popular diversion route when the M6 or A500 become blocked at peak times. This causes an increase in HGV and large vehicle traffic, which bottle necks on the bend by the AB12 site. Therefore, this proposed site for housing does not in any way feel suitable just based upon the safety of road users. The proposal on this site using unsuitable access roads feels like a desperate attempt to squeeze in houses, regardless of the safety implications on roads. Using an access road on Diglake Street would not be suitable. The road is narrow, the footpaths even narrower. Children and families walking to school or nursery would be at risk on a daily basis. The current level of traffic is already too much for the road to handle.</p>
<b>Q10 File 1</b>	6390682
<b>Q10 File 2</b>	6390683
<b>Q10 File 3</b>	6390684
<b>Attachments</b>	<a href="#">1364390 Rachel Hopkins 1.jpg</a> <a href="#">1364390 Rachel Hopkins 2.jpg</a> <a href="#">1364390 Rachel Hopkins 3.jpg</a>
<b>Comment ID</b>	NULLP1121
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Rachel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.</p> <p>On daily walks through the parish, and sitting in our garden, we are inundated with birdsong, the sounds of nature and free wildlife. Especially in the evenings, owls can be seen and bats flap freely through the air. Destroying our rural landscape will tear away the identity this parish has cultivated.</p> <p>I wish the local councillor to remove sites AB12, AB2 and AB33 from the local plan.</p>

<b>Comment ID</b>	NULLP1250
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Sheila
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I am responding to the following site plans.</p> <p>Plan: AB2 I OBJECT TO THIS PLAN. This junction is already at capacity &amp; can't cope with the sheer weight of traffic. If a massive warehouse is built, which incidentally is on good farming greenbelt land providing milk/beef etc and giving jobs to locals, the environmental impact will be catastrophic. We should be producing food IN this country rather than creating air miles by importing food/drink/fuel etc. It is already a bottle neck at Junction 16, M6 &amp; A500, causing many accidents. This results in vehicles, many of which are HGV's, causing them to congest country lanes around Audley &amp; surrounding villages. These narrow roads are not built to withstand this amount of heavy traffic. The proposed Emergency exits onto Park Lane &amp; Barthomley Road are very narrow one car width lanes without footpaths or street lighting. These lanes could equally be used by employees of the proposed factory to avoid queuing on the A500 &amp; making it a 'ratrun' adding to noise pollution.</p> <p>Plan: AB12 I OBJECT TO THIS PLAN. The access point to this site is proposed to be on Diglake Street. Have any of the planners ever been up this street? It is lined with terraced houses with all the residents parking on both sides of the road which leaves only room for one vehicle to navigate the street at a time. The idea of having a carpark for these residents is ludicrous, is someone seriously asking them to park away from their house &amp; bring shopping/carry children etc back to their house so these new homes can have the luxury of parking on their drive? If any of the residents are disabled will they expected to be wheelchaired back from the carpark in the rain/ice? There will be an additional 250 extra cars pulling out of/into Diglake Street &amp; Albert Street via Ravens Lane which is the main Nursery &amp; Primary School route. There is a children's play area at the end of Albert Street which would be become dangerous with the proposed amount of traffic passing it. It is already a dangerous junction without all this extra traffic. The Site AB12 is prime agricultural valued greenbelt land &amp; should remain as this, we need to be using this land to feed our country &amp; not polluting the atmosphere by importing food stuffs. If this land is developed it will have a high potential to flood making it unsound. The flood water run off will end up in Brierly Brook with the potential of flooding the surrounding agricultural fields. This land belongs to Staffordshire County Council, it is currently in use &amp; being farmed.</p> <p>Plan: AB33. I OBJECT TO THIS PLAN. The proposal to build 55 houses on this site is unviable firstly because of the access onto Park Lane which is as it says is a 'lane' so very narrow and single track. Two HGV's would be unable to pass anywhere &amp; there's limited passing places for cars. There is no footpath so walking down there when this site is built would be impossible as it would be too dangerous. The proposed field is a flood area, so building on it will push the water on to neighbouring properties causing them to flood.</p>
<b>Comment ID</b>	NULLP1248
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Sheila
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I am responding to the following site plans.</p> <p>Plan: AB2 I OBJECT TO THIS PLAN. This junction is already at capacity &amp; can't cope with the sheer weight of traffic. If a massive warehouse is built, which incidentally is on good farming greenbelt land providing milk/beef etc and giving jobs to locals, the environmental impact will be catastrophic. We should be producing food IN this country rather than creating air miles by importing food/drink/fuel etc. It is already a bottle neck at Junction 16, M6 &amp; A500, causing many accidents. This results in vehicles, many of which are HGV's, causing them to congest country lanes around Audley &amp; surrounding villages. These narrow roads are not built to withstand this amount of heavy traffic. The proposed Emergency exits onto Park Lane &amp; Barthomley Road are very narrow one car width lanes without footpaths or street lighting. These lanes could equally be used by employees of the proposed factory to avoid queuing on the A500 &amp; making it a 'ratrun' adding to noise pollution.</p> <p>Plan: AB12 I OBJECT TO THIS PLAN. The access point to this site is proposed to be on Diglake Street. Have any of the planners ever been up this street? It is lined with terraced houses with all the residents parking on both sides of the road which leaves only room for one vehicle to navigate the street at a time. The idea of having a carpark for these residents is ludicrous, is someone seriously asking them to park away from their house &amp; bring shopping/carry children etc back to their house so these new homes can have the luxury of parking on their drive? If any of the residents are disabled will they expected to be wheelchaired back from the carpark in the rain/ice? There will be an additional 250 extra cars</p>

	<p>pulling out of/into Diglake Street &amp; Albert Street via Ravens Lane which is the main Nursery &amp; Primary School route. There is a children's play area at the end of Albert Street which would be become dangerous with the proposed amount of traffic passing it. . It is already a dangerous junction without all this extra traffic. The Site AB12 is prime agricultural valued greenbelt land &amp; should remain as this, we need to be using this land to feed our country &amp; not polluting the atmosphere by importing food stuffs. If this land is developed it will have a high potential to flood making it unsound. The flood water run off will end up in Brierly Brook with the potential of flooding the surrounding agricultural fields. This land belongs to Staffordshire County Council, it is currently in use &amp; being farmed.</p> <p>Plan: AB33. I OBJECT TO THIS PLAN. The proposal to build 55 houses on this site is unviable firstly because of the access onto Park Lane which is as it says is a 'lane' so very narrow and single track. Two HGV's would be unable to pass anywhere &amp; there's limited passing places for cars. There is no footpath so walking down there when this site is built would be impossible as it would be too dangerous. The proposed field is a flood area, so building on it will push the water on to neighbouring properties causing them to flood.</p>
<b>Comment ID</b>	NULLP1247
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hopkins
<b>Consultee Given Name</b>	Sheila
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I am responding to the following site plans.</p> <p>Plan: AB2 I OBJECT TO THIS PLAN. This junction is already at capacity &amp; can't cope with the sheer weight of traffic. If a massive warehouse is built, which incidentally is on good farming greenbelt land providing milk/beef etc and giving jobs to locals, the environmental impact will be catastrophic. We should be producing food IN this country rather than creating air miles by importing food/drink/fuel etc. It is already a bottle neck at Junction 16, M6 &amp; A500, causing many accidents. This results in vehicles, many of which are HGV's, causing them to congest country lanes around Audley &amp; surrounding villages. These narrow roads are not built to withstand this amount of heavy traffic. The proposed Emergency exits onto Park Lane &amp; Barthomley Road are very narrow one car width lanes without footpaths or street lighting. These lanes could equally be used by employees of the proposed factory to avoid queuing on the A500 &amp; making it a 'ratrun' adding to noise pollution.</p> <p>Plan: AB12 I OBJECT TO THIS PLAN. The access point to this site is proposed to be on Diglake Street. Have any of the planners ever been up this street? It is lined with terraced houses with all the residents parking on both sides of the road which leaves only room for one vehicle to navigate the street at a time. The idea of having a carpark for these residents is ludicrous, is someone seriously asking them to park away from their house &amp; bring shopping/carry children etc back to their house so these new homes can have the luxury of parking on their drive? If any of the residents are disabled will they expected to be wheelchaired back from the carpark in the rain/ice? There will be an additional 250 extra cars pulling out of/into Diglake Street &amp; Albert Street via Ravens Lane which is the main Nursery &amp; Primary School route. There is a children's play area at the end of Albert Street which would be become dangerous with the proposed amount of traffic passing it. . It is already a dangerous junction without all this extra traffic. The Site AB12 is prime agricultural valued greenbelt land &amp; should remain as this, we need to be using this land to feed our country &amp; not polluting the atmosphere by importing food stuffs. If this land is developed it will have a high potential to flood making it unsound. The flood water run off will end up in Brierly Brook with the potential of flooding the surrounding agricultural fields. This land belongs to Staffordshire County Council, it is currently in use &amp; being farmed.</p> <p>Plan: AB33. I OBJECT TO THIS PLAN. The proposal to build 55 houses on this site is unviable firstly because of the access onto Park Lane which is as it says is a 'lane' so very narrow and single track. Two HGV's would be unable to pass anywhere &amp; there's limited passing places for cars. There is no footpath so walking down there when this site is built would be impossible as it would be too dangerous. The proposed field is a flood area, so building on it will push the water on to neighbouring properties causing them to flood.</p>

<b>Comment ID</b>	NULLP567
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Horne
<b>Consultee Given Name</b>	Fiona
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Site AB33 Land off Nantwich Road/Park Lane, Audley</p> <p>As with AB12, this proposed site represents a high contribution to the green belt and houses built here will add to the current flooding which occurs regularly. The lane leading to this site is, in places, single track and used regularly by walkers, horse riders and joggers and increased volume of traffic will pose a risk. All allocations in the Audley/Bignall End area proposed for housing are in the Green Belt. Besides the pressure increased traffic would cause on our already overcrowded and weak roads, these proposed developments would add significant pressure on local amenities, GP Practice, Dentist, Schools. These allocations are not justified and therefore unsound and should be removed from the Local Plan. Thank you for taking the time to read my comments and reasons for my strong objection to these planned developments</p>
<b>Comment ID</b>	NULLP556
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Horne
<b>Consultee Given Name</b>	Fiona
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Site AB12 Land East of Diglake Street</p> <p>An additional 125 houses on this greenbelt land would increase the existing flooding issue. The access points on Diglake Street and adjacent to 104 Ravens Lane cannot be viable. It will be chaos - terraced housing with everyone parking on either side of the road leaving room for only one vehicle to navigate the street.</p> <p>The proposal for a Car Park on AB12 cannot be viable. How can people be expected to park up the road and away from home? Are residents really expected to transfer babies/small children, pushchairs from their car to their home along with shopping etc? An additional 250 cars using Diglake Street and Albert Street and then on to Ravens Lane (a busy road which already suffers inconsiderate (though unavoidable due to many families owning multiple cars) parking on both sides of the road causing congestion). The volume of additional cars emerging from these terraced streets onto Ravens lane will impact hugely on the already over used route and will potentially endanger the lives of families using the nearby Nursery &amp; School routes? This is not deliverable and therefore unsound.</p> <p>The Local Plan does not propose to build schools, therefore how are the educational needs of the additional children moving into these new homes going to be met? I feel this proposal is unsound for the reasons stated above and wish for this site to be removed from the Local Plan.</p>
<b>Comment ID</b>	NULLP553
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Horne
<b>Consultee Given Name</b>	Fiona
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Policy AB2 Land at Junction 16 of the M6</p> <p>The site is 40% bigger than Newcastle Borough actually require. (22Ha has been stated as required whereas the proposed allocation is 80Ha at this site alone). This is not justified. Therefore housing/employment land ratio will be out of balance and will add pressure for even more housing development Junction 16 and A500 is extremely congested throughout the day/evening and ridiculously more so around commuting hours and causes a major bottleneck. In the event of an accident or issue on the M6 or A500 traffic diverts through the village of Audley causing major congestion and slow moving traffic issues and which our roads are unable to support. There is no public transport to the site, in fact the necessary bus service to Audley and surrounding villages has recently been drastically cut, people would unlikely use the proposed bus service or cycle to work due to longer journey times and difficult hills to navigate. As previously stated, Junction 16/A500 cannot support the existing volume of traffic so the junction will require major improvement requiring funding from Highways England which, due to the £22 billion shortfall in the nation's finances is undeliverable and</p>

will remain so for the Local Plan period. It is, therefore ineffective and hence unsound. Warehousing of this magnitude will potentially provide employment for 3000 - most travelling in via car. The increase in traffic congestion, air pollution from CO2 and tyre particulate pollution as well as noise pollution lorry park for 100 HGVs not to mention all the HGVs servicing the 1 million sq ft warehouse plus all the service vehicles is extremely concerning. The destruction of 170 acres of Green Belt land containing established trees and hedges will certainly negatively impact air quality leading to significant adverse effects on public health, both physical and mental. 2 x Emergency access points on Park Lane and Barthomley Road - these are narrow, winding country lanes without footpaths or street lighting. These lanes are enjoyed by dog walkers, horse riders and joggers, therefore such individuals' lives will be at risk as these lanes would very likely be used by employees as an alternative to queueing on the A500 I feel this proposal is unsound for the reasons stated above and wish for this site to be removed from the Local Plan



<b>Comment ID</b>	NULLP287
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Alison
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>BIAS</p> <p>Aspinall &amp; Verdi Study</p> <p>Cited in paragraph 3.24 "St Modwen Development SMD" has engaged extensively with the Local Plan Process. Originally with the Joint Local Plan and latterly through the Newcastle Under Lyme Local Plan process.</p> <p>The words cited in ARUP study 4.3-4.6 (inclusive) stated that "several stakeholders views were considered" There were 3 stakeholders and one of these was SMD</p> <p>The 'open' and 'candid' participation of the stakeholders cannot be assumed or evaluated</p> <p>The 'neutrality' of the studies is also compromised by the qualitative methodology and many judgement words such as 'we think', 'we feel' etc</p> <p>Any statistics which suggest limitations in the development of the site (AB2A) are met with Aspinall &amp; Verdi's subjective opinion.</p> <p>All of the documents included in the plan read like a 'developers charter' and not a democratic voice. There is no reference to the communitie's opinions highlighted in the Neighbourhood plans and meetings with the local council.</p> <p>As a "reasonable onlooker, with knowledge of the relevant facts, I would consider that the studies and the plan itself is biased in favour of using Green Belt land to construct huge 'box' style warehouses, HGV parking etc etc..... on a substantial piece of beautiful Green Belt agricultural land.</p>
<b>Q7 Modification</b>	<p>BIAS</p> <p>SMD have an invested interest into securing AB2 for employment land. As such, their comments in the Local Plan are biased in favour of their plans to develop the land.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP291
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Alison
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>The definition of health included in this document as a "state of complete physical, mental and social well being" WHO 1948 is outdated, absolute and medicalised.</p> <p>No one is ever able to achieve complete physical, mental and social well being and it is absurd to include it in the plan.</p> <p>In the face of an ageing global population with an increasing burden of chronic disease, it minimises the role of the human capacity to cope autonomously with life's ever changing physical, emotional, and social challenges and to function with fulfilment and a feeling of wellbeing with a chronic disease or disability.</p> <p>With this in mind, and the inclusion (vaguely) of the Determinants of Health (Dahlgren &amp; Whithead 1992) The whole focus of the plan should change from a 'developer driven,' 'opportunistic,' 'unrealistic,' set of documents to consider Audley and the residents living within it, working, studying, playing, running, walking, horse riding, shopping, socialising, living with health and/or disease as a holistic entity.</p> <p>Words such as 'housing' instead of homes, 'developments' instead of communities. Make inference to 'the community' 'people or individuals' who live within Audley as lack of these details suggest that the authors are detached and lack humanism.</p> <p>Omission of the contents of the Neighbourhood Plan and people's views, suggests an undemocratic approach with little understanding of the impact of these 'developments' on the community in which the Borough Council is supposed to serve.</p> <p>The health and wellbeing of the community in Audley and surrounding villages will be affected by the construction of 'huge' warehousing and the destruction of a huge area of Green Belt land through increased traffic, noise, air pollution, for a long period of time (up to ten yeears) as quoted in the Plan. The effect on the Determinants of Health for the community cannot be measured but may constitute an increased need for health services.</p>

<b>Q7 Modification</b>	<p>Demonstrate through language that the Plan considers the effect of the AB2A site on the community/village.</p> <p>It is an easy point to make that it does not affect the 'openness' of the countryside and all the added 'benefits' to it's inclusion in the Local Plan. Actively listen to the people who live in the community and demonstrate this in the words used in the documents.</p> <p>Reflect on the enormity of the decisions that you are making and the long term effect of these for our future generation and include these points so that people know that you appreciate their concerns.</p> <p>Be brave and leave a legacy of positivity not destruction.</p> <p>Consider alternatives with an open mind and not just 'the easy option'</p> <p>Consider the long term health effects of this urban style monstrosity on the people who live in the community.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP288
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Alison
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>2.21</p> <p>"Safeguarding land is particularly significant for influencing the future pattern of development"</p> <p>"As part of the exceptional circumstances case, the council has explored all reasonable options before considering Green Belt land. At present there is a lack of suitable, available and achievable Brownfield sites"</p> <p>It is questionable whether the exceptionally circumstances applied to AB2 land is sufficiently robust.</p> <p>The Exceptional Circumstances listed in NPPF Gov.uk 154 lists the exceptional circumstances required to the construction of new buildings on Green Belt</p> <p>146. Make as much use possible of Brownfield land</p> <p>147. First consideration should be given to land which has previously been developed</p> <p>154 A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The list progresses and does not support the local Plan to include AB2A</p>
<b>Q7 Modification</b>	<p>ARUP study is explicit in that it states (Purpose 3 NPPF)</p> <p>" the south eastern and southern boundaries consist of field boundaries which are less durable and would NOT PREVENT ENCROACHMENT if the site was developed"</p> <p>"overall the site makes a strong contribution to safeguarding from encroachment as it has a strong degree of openness, it is connected to the countryside and the south eastern and southern boundaries are less durable"</p> <p>Aspinall and Verdi</p> <p>"Development would represent a SIGNIFICANT ENCROACHMENT into the countryside and therefore removal of the site from Green Belt could HARM the overall function and integrity of the Green Belt."</p> <p>Recommendation: EXCLUDE SITE FROM PROCESS</p> <p>This assessment should hold enough weight to stop this development! If it does not and is left to The Council to decide what is its value?</p> <p>2.21 The plan suggests that there is a lack of "suitable, available and achievable Brownfield sites"</p> <p>This is questionable..... and should not be due to lack of economically viable sites.</p> <p>Aspinall Verdi p.13 para 2.30</p> <p>BW2 is an alternative site although it is listed as not being promoted</p> <p>This industrial estate (High Carr Business Park) is an established industrial/logistical location situated of Talke Road (A34) which is within close proximity to the A500 dual carriageway, approximately 1.3 miles, and 5 miles from Junction 16 of the M6 Motorway and other arterial roads in the area to include the A50 giving access to Derby and the M1 Motorway.</p> <p>There are approx 65 hectares of unused land adjacent to this site.</p> <p>Some of this land is undulated (as is AB2A) and contains overgrown bracken, scrubland and weeds</p> <p>The land was considered for housing and determined as not viable but it could be considered for employment land. The land already holds much of the infrastructure required (which AB2A) does not have and would be viable as an alternative site.</p> <p>The site is close to public transport. Buses run regularly from the South of the City (Trentham) and the North e.g Crewe etc</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP290
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>The definition of health included in this document as a "state of complete physical, mental and social well being" WHO 1948 is outdated, absolute and medicalised.</p> <p>No one is ever able to achieve complete physical, mental and social well being and it is absurd to include it in the plan.</p> <p>In the face of an ageing global population with an increasing burden of chronic disease, it minimises the role of the human capacity to cope autonomously with life's ever changing physical, emotional, and social challenges and to function with fulfilment and a feeling of wellbeing with a chronic disease or disability.</p> <p>With this in mind, and the inclusion (vaguely) of the Determinants of Health (Dahlgren &amp; Whithead 1992) The whole focus of the plan should change from a 'developer driven,' 'opportunistic,' 'unrealistic,' set of documents to consider Audley and the residents living within it, working, studying, playing, running, walking, horse riding, shopping, socialising, living with health and/or disease as a holistic entity.</p> <p>Words such as 'housing' instead of homes, 'developments' instead of communities. Make inference to 'the community' 'people or individuals' who live within Audley as lack of these details suggest that the authors are detached and lack humanism.</p> <p>Omission of the contents of the Neighbourhood Plan and people's views, suggests an undemocratic approach with little understanding of the impact of these 'developments' on the community in which the Borough Council is supposed to serve.</p> <p>The health and wellbeing of the community in Audley and surrounding villages will be affected by the construction of 'huge' warehousing and the destruction of a huge area of Green Belt land through increased traffic, noise, air pollution, for a long period of time (up to ten yeears) as quoted in the Plan. The effect on the Determinants of Health for the community cannot be measured but may constitute an increased need for health services.</p>
<b>Q7 Modification</b>	<p>Demonstrate through language that the Plan considers the effect of the AB2A site on the community/village.</p> <p>It is an easy point to make that it does not affect the 'openness' of the countryside and all the added 'benefits' to it's inclusion in the Local Plan. Actively listen to the people who live in the community and demonstrate this in the words used in the documents.</p> <p>Reflect on the enormity of the decisions that you are making and the long term effect of these for our future generation and include these points so that people know that you appreciate their concerns.</p> <p>Be brave and leave a legacy of positivity not destruction.</p> <p>Consider alternatives with an open mind and not just 'the easy option'</p> <p>Consider the long term health effects of this urban style monstrosity on the people who live in the community.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP292
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Site Allocations Page 109 Local Plan</p> <p>Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 with emergency access via Barthomley Road, both to be delivered in Phase 1 of the developmen</p> <p>The 'Emergency Access' from Nantwich road through Barthomley road to the crossroads (Peel Hollow to the left, Moat Lane to the right) is not a vailble road for emergency access vehicles. Therefore, tthis part of the plan is unjustified.</p> <p>io.gov.uk recommend 3.7 metres width between kerbs (of which there are none on Barthomley Road, Peel Hollow or Moat Lane)</p> <p>Some areas along Barthomley Road are only 2.7 Metres.</p> <p>Barthomley Road is a narrow unpaved lane with minimal lighting and no lighting where the crossroads are.</p>

	<p>Due to the confinement and blind spots on the road it would be hazardous to secure the safety of pedestrians, horse riders and other vehicle users.</p> <p>In some parts of the road the camber is difficult to negotiate with oncoming traffic (The Black and White House). The curvature, narrowness and blind spot at The Croft is a significant challenge when there is oncoming traffic and pedestrians and horse riders.</p> <p>From West View to Coopers Green Farm there are no street lights and the hedges are dense and over populated making safety an issue.</p>
<b>Q7 Modification</b>	<p>There is little modification that could be done to provide safe access for emergency vehicles to the proposed employment site.</p> <p>With the proposed Large Warehouse Development Park on AB2A and the substantial numbers of employees and employers one can only assume that the number of times Barthomley Road is used for emergency access will increase significantly in contrast to what it is currently.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP289
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hough
<b>Consultee Given Name</b>	Stephen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>2.21</p> <p>"Safeguarding land is particularly significant for influencing the future pattern of development"</p> <p>"As part of the exceptional circumstances case, the council has explored all reasonable options before considering Green Belt land. At present there is a lack of suitable, available and achievable Brownfield sites"</p> <p>It is questionable whether the exceptional circumstances applied to AB2 land is sufficiently robust.</p> <p>The Exceptional Circumstances listed in NPPF Gov.uk 154 lists the exceptional circumstances required to the construction of new buildings on Green Belt</p> <p>146. Make as much use possible of Brownfield land</p> <p>147. First consideration should be given to land which has previously been developed</p> <p>154 A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The list progresses and does not support the local Plan to include AB2A</p>
<b>Q7 Modification</b>	<p>ARUP study is explicit in that it states (Purpose 3 NPPF)</p> <p>" the south eastern and southern boundaries consist of field boundaries which are less durable and would NOT PREVENT ENCROACHMENT if the site was developed"</p> <p>"overall the site makes a strong contribution to safeguarding from encroachment as it has a strong degree of openness, it is connected to the countryside and the south eastern and southern boundaries are less durable"</p> <p>Aspinall and Verdi</p> <p>"Development would represent a SIGNIFICANT ENCROACHMENT into the countryside and therefore removal of the site from Green Belt could HARM the overall function and integrity of the Green Belt."</p> <p>Recommendation: EXCLUDE SITE FROM PROCESS</p> <p>This assessment should hold enough weight to stop this development! If it does not and is left to The Council to decide what is its value?</p> <p>2.21 The plan suggests that there is a lack of "suitable, available and achievable Brownfield sites"</p> <p>This is questionable..... and should not be due to lack of economically viable sites.</p> <p>Aspinall Verdi p.13 para 2.30</p> <p>BW2 is an alternative site although it is listed as not being promoted</p> <p>This industrial estate (High Carr Business Park) is an established industrial/logistical location situated off Talke Road (A34) which is within close proximity to the A500 dual carriageway, approximately 1.3 miles, and 5 miles from Junction 16 of the M6 Motorway and other arterial roads in the area to include the A50 giving access to Derby and the M1 Motorway.</p> <p>There are approx 65 hectares of unused land adjacent to this site.</p> <p>Some of this land is undulated (as is AB2A) and contains overgrown bracken, scrubland and weeds</p> <p>The land was considered for housing and determined as not viable but it could be considered for employment land. The land already holds much of the infrastructure required (which AB2A) does not have and would be viable as an alternative site.</p> <p>The site is close to public transport. Buses run regularly from the South of the City (Trentham) and the North e.g Crewe etc</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP411
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Howell
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Concerns for AB2</p> <p>Greenbelt land</p> <ul style="list-style-type: none"> <li>The green belt site review consolidated report 16 July 2024 (table 17, page 28) recommends exclusion of this site.</li> <li>Staffs County Council the "vision enterprise CIC Audley Parish Green Belt" judged that the Audley Green Belt contributed strongly in safeguarding the encroachment of urbanisation. (Green belt review V2.4 August 22)</li> </ul> <p>Employment</p> <ul style="list-style-type: none"> <li>this site is prime agricultural land that employs a number of people, the farmers, the contractors who cut the hedges and do the silaging, vets, auctioneers, hauliers delivering corn and straw, the corn firms, the abattoir, etc. So this is already employment land. Employment land that helps to contribute to feeding out nation.</li> <li>There are vast areas of warehouses in the area, a lot that are empty, in staffordshire and across the boarder into cheshire, so I do not believe these are needed.</li> <li>Warehouse tend to employ low skilled, low paid people not the vast array of highly skilled jobs that agricultural land provides.</li> <li>Britain is running out of land for food and is already in a food and drink deficit. This makes agricultural land more valuable than ever.</li> </ul> <p>Environmental</p> <ul style="list-style-type: none"> <li>Loss of prime agricultural land.</li> <li>Loss of hedgerows and manipulation of natural topography.</li> <li>Loss of local wildlife</li> <li>Visual, noise, light, air pollution.</li> <li>Impact on residents living against the site.</li> <li>Flooding(AB2 is currently 100% fields this will be changed to hard surfaces causing run off)</li> <li>Loss of biodiversity</li> </ul> <p>Road infrastructure</p> <ul style="list-style-type: none"> <li>Option 1. Breaking into an already busy M6 junction 16 roundabout interchange will have a direct impact on the A500 and access on and off the M6. Daily traffic queues are already an issue at this junction.</li> <li>Option 2. Creating access to AB2 via the north bound carriageway of A500 where an existing lay-by is situated. Again every morning there are queues here, which get a mention on the local radio daily.</li> <li>Emergency access roads to AB2 site proposed off Park Lane. Is this feasible or Safe for such a narrow country lane since Park Lane is a single cars width lane with passing places and no pavement or street lighting. Widening would impact on a greater area outside the AB2 Site.</li> <li>A concern is Park Lane would be used as access for workers to the site. If the lane became any busier than it already is it would become unsafe for residents, ramblers, dog walkers, local running club, horse riders (livery stables sited at Park End, Park Lane), bird watchers, families with bikes and prams who use it regularly. Dairy cattle have to cross Park Lane from field to farm for milking as well.</li> <li>Regarding Accessibility for workers at AB2, there is currently no bus or rail link. The site is isolated from both transport and amenities ie shops. It is impossible to walk or cycle there using the designated access off A500 (would mean walking/cycling along a very busy dual carriageway with no pavement) around junction 16.</li> </ul> <p>Other concerns</p> <ul style="list-style-type: none"> <li>The site has a number of footpaths, that are well used by residents of Audley, it became invaluable to peoples wellbeing and mental health during the covid epidemic.</li> </ul> <p>Personal impact</p> <ul style="list-style-type: none"> <li>In particular there are 3 family homes, [redacted by admin], which AB2 would surround 3 sides [redacted by admin].</li> <li>As [redacted by admin], I have access along the side track to the rear of [redacted by admin] property. This has been earmarked as an emergency exit. [redacted by admin] access would need to remain at all times,</li> <li>In addition the 3 septic tanks at the rear of the properties are emptied annually, the tanker has access rights to use the field (part of AB2) to gain access to the septic tanks. The drainage is in</li> </ul>

	<p>these fields, so again that would be needed to be taken into account. The homes would require the developer to make alternative provision.</p> <ul style="list-style-type: none"> <li>• I urge extra consideration in planning, even with natural screening these 3 properties will be greatly affected and the residents should be given an option for compensation or compulsory purchase. [redacted by admin]</li> </ul>
<b>Q7 Modification</b>	<p>This site is prime agricultural land that should be safeguarded. I recommend an alternative site is found and this site be removed from the local plan.</p>



<b>Comment ID</b>	NULLP117
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Howells
<b>Consultee Given Name</b>	Yvonne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site 8 (G & T)
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Concerns about access roads to the proposed sites:</p> <p>SP11(4), SP23 and G and T8 access to these sites will greatly increase traffic along The Racecourse by Silverdale Primary Academy creating potential accidents with children along the busy road. Access then on to the High Street will need to be made sound.</p> <p>The proposed sites listed above are on green belt land which I believed couldn't be built upon. The old golf course is an area of woods and grass land which has been naturalised over the last 20 years - it is such a shame to destroy the 'lungs' of Newcastle. This area should be preserved not reduced by half surrounded by a housing development.</p> <p>Concerned about the drainage and sewage removal which will overload the already struggling old pipe work of the village of Silverdale.</p>
<b>Q7 Modification</b>	<p>If it is absolutely necessary to build on such wonderful green belt land I hope that the number of houses is greatly reduced to lessen the impact on the village of Silverdale and surrounding area with pollution and detriment to its infrastructure.</p> <p>There are many brown sites in Newcastle that should be used for building houses and flats before considering green belt land.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP116
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Howells
<b>Consultee Given Name</b>	Yvonne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Concerns about access roads to the proposed sites:</p> <p>SP11(3) Ashbourne Drive and Staveley Place cannot take any extra traffic and there will be more traffic at the junction with High Street. 235 homes to be built - potential of 470 extra cars using this road and junction</p> <p>SP11(4), SP23 and G and T8 access to these sites will greatly increase traffic along The Racecourse by Silverdale Primary Academy creating potential accidents with children along the busy road. Access then on to the High Street will need to be made sound.</p> <p>SP11(2) and SP11(1) access from the A525 to these 2 sites will need traffic lights or roundabouts causing further congestion on an already busy road. Likewise access to SP23 along Cemetery Road.</p> <p>The building of 1100 new houses will cause 2200 (at least) cars to be in the Silverdale area causing pollution - Something not wanted after years of pollution from Walley's Quarry.</p> <p>The proposed sites listed above are on green belt land which I believed couldn't be built upon. The old golf course is an area of woods and grass land which has been naturalised over the last 20 years - it is such a shame to destroy the 'lungs' of Newcastle. This area should be preserved not reduced by half surrounded by a housing development.</p> <p>Concerned about the drainage and sewage removal which will overload the already struggling old pipe work of the village of Silverdale.</p>
<b>Q7 Modification</b>	<p>If it is absolutely necessary to build on such wonderful green belt land I hope that the number of houses is greatly reduced to lessen the impact on the village of Silverdale and surrounding area with pollution and detriment to its infrastructure.</p> <p>There are many brown sites in Newcastle that should be used for building houses and flats before considering green belt land.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1504
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Huckfield
<b>Consultee Given Name</b>	Derrick
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	G&T 8
<b>Q6 Details</b>	<p>I write this letter on behalf of all the residents I serve. Newcastle under Lyme Council is proposing to seize established Allotment Gardens, abolish a 200 year public footpath all to meet their Gypsy Travellers requirement for 5 travellers. It has come to my attention from other people that this Allotment land is contaminated with asbestos on the surface and buried underground. This land sits on natural springs and has tendencies to become water logged. The Councils proposal will require; terminating existing allotment garden holders, either abolishing or rerouting an established public footpath, developing a completely new road (approx quarter mile) requiring new sewerage and drainage, clearing the asbestos, above and below ground and the provision of street lighting, all negating any conservational benefits of the green fields that this proposed development will consume. The Council have not considered the cost but it will be staggering. The Council have not even- considered the impact on the local village and primary school that this development will cut across if a new road is installed. This site is land locked and the Council will need to acquire access.</p>
<b>Q7 Modification</b>	<p>My Alternative Proposal</p> <p>There is a 21 caravan Gypsy site 500 metres away from this proposal, with all the services in place. There is land at the side of this site that could be acquired to meet the 5 Gypsy travellers that the Councils are proposing to house. It abuts a main road with all the needed services. I believe there should be a complete investigation of this proposal when there is a much cheaper alternative in close proximity. This would allow the allotment gardens to remain as they have for the last 200 years. I have enclosed 2 maps to help.</p>
<b>Attachments</b>	<a href="#">1369504 Huckfield.pdf</a>

<b>Comment ID</b>	NULLP170
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Hughes
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I strongly oppose to the inclusion of the AB2 employment site in Audley as it is not justified and is unsound for the following reasons;</p> <ol style="list-style-type: none"> <li>1 Inclusion of AB2 would allow major incursion and encroachment into the countryside and have a negative impact on the rural village of Audley.</li> <li>2 The employment site is 40% bigger than Newcastle Borough actually require so the housing/employment land ratio will be out of balance and will add pressure for even more housing development of which Audley's road network and existing facilities ie. doctors, public services, schools etc cannot accommodate.</li> <li>3 The existing M6/A500 roundabout junction is not fit for purpose to accommodate thousands of extra vehicles on a daily basis. The A500 on the Staffordshire and East Cheshire sides is regularly bottle necked each day. Every morning and evening the tailback from the roundabout extends along the A500 past the A500 Audley sliproad which is around 1 mile away.</li> <li>4 There is currently no public transport to anywhere near the proposed site. Audley rural centre is the closest drop off point which has had many of its bus routes removed by local transport providers.</li> <li>5 The assumption that people will travel to the site on a bike is unjustified as there are many narrow and hilly roads leading back to Newcastle Under Lyme via Bignall Hill (B5500). Conversely, the road to Crewe via the B5500 is a national speed limit road and would be very dangerous to cycle along.</li> <li>6 The existing green belt farmland is prime agricultural land that is used to grow crops and rear beef cattle for the UK market. The proposal is to remove 80 hectares of prime agricultural, greenbelt land to replace with 22 hectares of employment land which would have a negative impact on food producing and also impact on local agricultural employment.</li> <li>7 The proposal is for two emergency site access points to Park Lane and Barthomley Road. I personally live along Nantwich Rd in Audley on the B5500 and the road traffic is extreme in the mornings and evenings during rush hour traffic. My road links both of these roads together. I am very concerned that any of the site 3000 employees travelling from the Newcastle Under Lyme Borough will use Audley as a cut through/drop off point at these two emergency site access points which will further increase road traffic through Audley. Both Barthomley Rd and Park Lane are narrow country lanes with no pedestrian footpaths which are difficult to navigate especially when passing vehicles coming from both directions, they can be dangerous roads to walk along regardless of time of day.</li> <li>8 The previous 'Strategic Employment Site Assessment Report 2023' highlighted that the AB2 proposed site is located within Flood Zones 2 and 3 which are at higher risk of flood.</li> <li>9 There will be a range of significant adverse effects including increased light pollution, noise pollution, air pollution and visual impact from the elevated position of Audley Rural town centre.</li> <li>10 The previous 'Strategic Employment Site Assessment Report 2023' suggest that the site would take approximately 5 years to complete noting that based upon a start date in 2024 it would reach practical completion by 2029. This would have a drawn-out negative impact on the surrounding area and its residents due to the construction process including dust, air pollution, noise pollution, increased traffic to name a few.</li> <li>1 The Table on page N37 identifies that site AB2 would have major negative impacts on: 'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this is not being taken forward.</li> <li>2 Tables N10 and N11 set out growth strategy options. I note that option 6D does not include site AB2 and delivers better scores/outcomes.</li> <li>3 The Strategic Housing &amp; Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable &amp; Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the green belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report. There is still a big inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.</li> <li>4 Allocation of this site is not justified by the Economic Needs Assessment Newcastle-underLyme &amp; Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of Urban Vision Enterprise comprises UVE Planning Limited (Company Number 15166024) and Urban Vision Enterprise CIC (Company No. 7690116). Registered address: Foxlowe Arts Centre (1st Floor), Stockwell Street,</li> </ol>

	<p>Leek, Staffordshire, ST13 6AD. Directors: Hannah Barter; Dave Chetwyn. employment land'. This further highlights how allocation of site AB2 would undermine regeneration elsewhere.</p> <p><b>5</b> Potential of 3000 employees - most travelling in via car, lorry park for 100 HGVs not to mention all the HGVs servicing the 1 million sq ft warehouse plus all the service vehicles - increase in traffic congestion, air pollution from CO2 and tyre particulate pollution as well as noise pollution.</p>
<b>Q7 Modification</b>	To make the plan sound AB2 must be removed from the plan with more emphasise to the use of brownfield sites in the borough. Allocation of site AB2/AB2A is in contradiction to the Local Plan's own evidence base and emerging policies and also inconsistent with national policy and guidance. It would cause substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire areas.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP32
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Hughes
<b>Consultee Given Name</b>	Joseph
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Comments as a concerned resident of (Redacted by admin), on the Regulation 19 Draft Local Plan. I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023"). I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: 2 / 3 - The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services. The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper "(June 2021 topic paper-paragraph 124) notes that Loggerheads the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site. 2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. 3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p> <p>I am one of the regular pedestrians on this road that snakes through from Newcastle Rd to the T junction with Mucklestone Rd. I say "on" this road because that is where you have to walk, due to MWL having a pavement footpath for only 25% on just one side of the road.</p> <p>Street lighting is restricted in similar fashion to part only of Mucklestone Wood lane.</p> <p>If planning is approved this would mean circa 150 extra vehicles per day spilling out directly on to MWL and all returning on the same MWL, This does not take into account the dozens of delivery vehicles ( Amazon DHL etc to name just 2)</p>

	<p>The impact on vehicle and pedestrian use is a massive cause for concern particularly for the safety of pedestrians.</p> <p>All social housing occupants will need vehicles to access all facilities including taking children to school if the existing schools can actually accommodate them?</p> <p>All the objections stated against the previous housing application for this site are applicable here. It is not sustainable as it has no merit, need or benefit whatsoever, and makes it axiomatic that this location should not be included in the plan NPPF2023.</p>
<b>Comment ID</b>	NULLP34
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Hughes
<b>Consultee Given Name</b>	Joseph
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Comments as a concerned resident of (Redacted by admin), on the Regulation 19 Draft Local Plan. I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023"). I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified. Summary of Reasons 1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: 2 / 3 - The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure, available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services. The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services. In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023. 2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site. 2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. 3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site. 6. Policy PSD3: Distribution of Development (page 16) (i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural 3 / 3 centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase. (ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres. 7. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p> <p>I am one of the regular pedestrians on this road that snakes through from Newcastle Rd to the T junction with Muckleston Rd. I say "on" this road because that is where you have to walk, due to MWL having a pavement footpath for only 25% on just one side of the road.</p>



Street lighting is restricted in similar fashion to part only of Mucklestone Wood lane.

If planning is approved this would mean circa 150 extra vehicles per day spilling out directly on to MWL and all returning on the same MWL, This does not take into account the dozens of delivery vehicles ( Amazon DHL etc to name just 2)

The impact on vehicle and pedestrian use is a massive cause for concern particularly for the safety of pedestrians.

All social housing occupants will need vehicles to access all facilities including taking children to school if the existing schools can actually accommodate them?

All the objections stated against the previous housing application for this site are applicable here. It is not sustainable has no merit need or benefit whatsoever, and makes it axiomatic that this location should not be included in the plan NPPF2023.

## Hulse, Carl

<b>Comment ID</b>	NULLP98
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Hulse
<b>Consultee Given Name</b>	Carl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p>I strongly object to the planning proposals at red street.</p> <p>My reasons for objection are as follows.</p> <p>There are mine workings under this proposed development and also a main gas pipe do these matters of concern present a risk to this proposed development and the surrounding areas as a result.</p>

<b>Comment ID</b>	NULLP672
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Elizabeth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>I wish to register my objections to the plan to build 1,100 homes in Silverdale.</p> <p>I particularly wish to object to the plan to build on the fields at the top of Racecourse. Not only will this destroy the habitat of countless wildlife and birds and take away the small playpark, it would also make life for the residents of Racecourse intolerable due to increased traffic. This is a small, residential street which already sees unacceptable volumes of traffic due to the school and cars using it as a cut through to the top of High Street. To have a planned access at the top of the road is simply unacceptable and is totally unfair on the residents of Racecourse. In addition, the road itself would not be able to cope with the increased levels of traffic. It has already collapsed twice in the past two years.</p> <p>Not only do we, (redacted by admin), suffer dreadfully from the effects of Walley's Quarry, we are also going to be denied being able to walk along the bottom of Park Road and enjoy the beauty of nature. The risk of flooding is also a major concern. The field provides natural drainage and yet there is still a river that runs down Racecourse after a downpour.</p>

<b>Comment ID</b>	NULLP465
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Jed
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>I wish to register my objections to the plan to build 1,100 homes in Silverdale.</p> <p>I particularly wish to object to the plan to build on the fields at the top of Racecourse. Not only will this destroy the habitat of countless wildlife and birds and take away the small playpark, it would also make life for the residents of Racecourse intolerable due to increased traffic. This is a small, residential street which already sees unacceptable volumes of traffic due to the school and cars using it as a cut through to the top of High Street. To have a planned access at the top of the road is simply unacceptable and is totally unfair on the residents of Racecourse. In addition, the road itself would not be able to cope with the increased levels of traffic. It has already collapsed twice in the past two years.</p> <p>Not only do we, as residents of (redacted by admin), suffer dreadfully from the effects of Walley's Quarry, we are also going to be denied being able to walk along the bottom of Park Road and enjoy the beauty of nature. The risk of flooding is also a major concern. The field provides natural drainage and yet there is still a river that runs down Racecourse after a downpour.</p>

<b>Comment ID</b>	NULLP1314
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Julia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>These comments are in relation to <b>Audley</b>, as I'm a (REDACTED BY OFFICERS)</p> <p><u>EMPLOYMENT</u></p> <p>I understand that employment is a key factor for the economic redevelopment of the country – however, the proposals at AB2 would be CATASTROPHIC for this area!!!</p> <p>As a resident, I do find it difficult to comprehend how this proposal has got to this stage of developed and made it onto 'the plan'. Can appreciate it must look good on paper i.e. built on land between a major arterial road and motorway interchange (A500 / M6 Junction 16), so good for a transport link? <u>No!</u></p> <p>Anyone who lives in Audley, or has to use the A500 / M6 around J16 will know this area is a complete environmental mess already – the congestion, pollution and anti-social behaviours exhibited here are atrocious (the amount of litter visible on the roadsides alone are an embarrassment to the city; goodness knows the effect this causes on the wildlife in the fields adjoining).</p> <p>At busy times, traffic including HGV's crawl through this area, sending pollution levels soaring - and that's if the motorway is running OK. If the motorway has any holdup or delay, the problems multiply massively. Congestion is huge, pollution levels go through the roof, and the roads through the village become 'rat-runs' for drivers looking for a way around the bottlenecks – very dangerous and damaging. Net result, all of the previously listed traffic related problems multiply several-fold.</p> <p>The thought of a long-term, large-scale development as proposed, at this location, is mind-blowing. It will be an ecological disaster, and bring stress, anxiety and associated health issue to the area for many years.</p> <p>So I therefore strongly object to the proposals for AB2, AB12, AB15 and AB33.</p>
<b>Comment ID</b>	NULLP1301
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Julia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>These comments are in relation to <b>Audley</b>, as I'm a (REDACTED BY OFFICERS)</p> <p><u>HOUSING</u></p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p> <p>The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.</p> <p>Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.</p> <p>My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to 15 of the M6 via the A500 will confirm).</p> <p>The proposed number of new houses in this area would have a devastating effect for local residents and wildlife.</p>

<b>Comment ID</b>	NULLP1295
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Julia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>These comments are in relation to <b>Audley</b>, as I'm a (REDACTED BY OFFICERS)</p> <p><u>HOUSING</u></p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p> <p>The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.</p> <p>Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.</p> <p>My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to15 of the M6 via the A500 will confirm).</p> <p>The proposed number of new houses in this area would have a devastating effect for local residents and wildlife.</p>
<b>Comment ID</b>	NULLP1303
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Julia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>These comments are in relation to <b>Audley</b>, as I'm a (REDACTED BY OFFICERS)</p> <p><u>HOUSING</u></p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p> <p>The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.</p> <p>Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.</p> <p>My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to15 of the M6 via the A500 will confirm).</p>



The proposed number of new houses in this area would have a devastating effect for local residents and wildlife.

<b>Comment ID</b>	NULLP1114
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Kevan
<b>Q6 Details</b>	<p>Thank you for the Invite to comment on the Final Draft Local Plan and supporting documents.</p> <p>It's nice to think we have a say in the future of our area – and I'm sure the 1000+ pages of documentation provided is to ensure we have access to all the facts!?</p> <p>As I'm not an expert on law and planning policy, I'm going to have to assume that the documentation will have been check for 'legal compliance' by the department (Sec. B5 of the form refers). Have to say the documentation provided and 'Representation Form' are difficult to access and navigate through, and instructions lack clarity. Some might even say it's a barrier preventing a true representative view from local communities! In short, the process is not user friendly, so will put a lot of people off commenting, in my view. So, although I'm not a complete technophobe, I've abandoned an attempt to complete and return the form, and have instead documented my views in this email and hope this will suffice.</p>
<b>Comment ID</b>	NULLP1118
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Kevan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>These comments are in relation to the <b>Audley Ward</b>, which is my area of experience given that I live there.</p> <p><u>EMPLOYMENT</u></p> <p>Again, accept that employment is a key factor for the economic redevelopment of the country – however, the proposals at AB2 would be CATASTROPHIC for this area!!!</p> <p>As a resident, I do find it difficult to comprehend how this proposal has got to this stage of developed and made it onto 'the plan'. Can appreciate it must look good on paper i.e. built on land between a major arterial road and motorway interchange (A500 / M6 Junction 16), so good for a transport link? <u>No!</u></p> <p>Anyone who lives in Audley, or has to use the A500 / M6 around J16 will know this area is a complete environmental mess already – the congestion, pollution and anti-social behaviours exhibited here are atrocious (the amount of litter visible on the roadsides alone are an embarrassment to the city; goodness knows the effect this causes on the wildlife in the fields adjoining).</p> <p>At busy times, traffic including HGV's crawl through this area, sending pollution levels soaring - and that's if the motorway is running OK. If the motorway has any holdup or delay, the problems multiply massively. Congestion is huge, pollution levels go through the roof, and the roads through the village become 'rat-runs' for drivers looking for a way around the bottlenecks – very dangerous and damaging. Net result, all of the previously listed traffic related problems multiply several-fold.</p> <p>The thought of a long-term, large-scale development as proposed, at this location, is mind-blowing. It will be an ecological disaster, and bring stress, anxiety and associated health issue to the area for many years.</p> <p>So I therefore strongly object to the proposals for AB2, AB12, AB15 and AB33.</p>
<b>Comment ID</b>	NULLP1116
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Kevan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>These comments are in relation to the <b>Audley Ward</b>, which is my area of experience given that I live there.</p> <p><u>HOUSING</u></p> <p>Firstly, must state I'm not a "NIMBY"; I fully accept that we need more housing nationally, however ...</p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p>

	<p>The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.</p> <p>Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.</p> <p>My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to 15 of the M6 via the A500 will confirm).</p> <p>To reiterate, I'm genuinely not a 'NIMBY', but the proposed number of houses in this area would have a devastating effect for local residents and wildlife.</p> <p>So I therefore strongly object to the proposals for AB2, AB12, AB15 and AB33.</p>
<b>Comment ID</b>	NULLP1117
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Kevan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>These comments are in relation to the <b>Audley Ward</b>, which is my area of experience given that I live there.</p> <p><u>HOUSING</u></p> <p>Firstly, must state I'm not a "NIMBY"; I fully accept that we need more housing nationally, however ...</p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p> <p>The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.</p> <p>Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.</p> <p>My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to 15 of the M6 via the A500 will confirm).</p> <p>To reiterate, I'm genuinely not a 'NIMBY', but the proposed number of houses in this area would have a devastating effect for local residents and wildlife.</p> <p>So I therefore strongly object to the proposals for AB2, AB12, AB15 and AB33.</p>
<b>Comment ID</b>	NULLP1115
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Humphreys
<b>Consultee Given Name</b>	Kevan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>These comments are in relation to the <b>Audley Ward</b>, which is my area of experience given that I live there.</p> <p><u>HOUSING</u></p> <p>Firstly, must state I'm not a "NIMBY"; I fully accept that we need more housing nationally, however ...</p> <p>I wish to strongly object to the proposed construction of new housing in previously undeveloped land in the Audley area (AB12, AB15, AB33). This is because:-</p>

The existing local infrastructure is simply unable to support any further developments – the village is already blighted with crowded and potholed roads (the illegal parking in the village has to be seen to be believed) – so is already a danger to drivers and pedestrians. The additional traffic from any new developments will make this much, much worse.

Also, there is already a stark lack of access to facilities - such as doctors / dentists / schools / shops / buses etc. – and the planned developments will undoubtedly have a devastating effect on local wildlife and rural land, including erosion of green belt, higher levels of pollution and even more congestion (as any recent survey / examination must show, levels of pollution and congestion in the centre is already appreciably higher than expected for a 'village'). So the factors above would have a major long-term detrimental effect on the physical health and mental wellbeing of existing residents.

My understanding is that government policy states that development of greenbelt should only be considered in "exceptional circumstance"? What are the exceptional circumstances? Surely it can't be that there are no other locations within the area where brown field land cannot be used? A journey through our city reveals many areas of abandoned and derelict land, including former industrial and domestic uses (as one drive from Junction 16 to 15 of the M6 via the A500 will confirm).

To reiterate, I'm genuinely not a 'NIMBY', but the proposed number of houses in this area would have a devastating effect for local residents and wildlife.

So I therefore strongly object to the proposals for AB2, AB12, AB15 and AB33.

<b>Comment ID</b>	NULLP1443
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Humphries
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1442
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Humphries
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this</p>



	<p>fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP14
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Family Name</b>	Hutton
<b>Consultee Given Name</b>	Graham
<b>Q6 Details</b>	<p>I think the Local Plan is an excellent document and commend it to the Planning Inspectorate. It addresses population increase, employment, environment and access to utilities. It will stop the unhindered development that is happening on prime agricultural land, such as Baldwin's Gate, and develop grey belt land such as the disused Keele Golf Club (a blight on the landscape). Development should take into consideration access to trunk roads and sewage as these are major factors in developing in a largely rural Borough. I believe this Local Plan addresses all these issues, is balanced and aims for a development rate in keeping with the identified need.</p> <p>Besides a resident, I was a [redacted by admin] when this plan was started and I am delighted to see it finalised. I am also a [redacted by admin]</p>

<b>Comment ID</b>	NULLP164
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Jervis
<b>Consultee Given Name</b>	Tom
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I Strongly oppose the Keele developments (SP11) based on Soundness of plan in particular (SP11 1 &amp; 2) which I consider wholly inappropriate, over the top, and an assault on a beautiful green space, frequently used by many local walkers / dog owners. (KL15 on attached Sheet)</p> <p>1) Not Justified</p> <p>a) SP11 can't be justified due to the impacts (public parkland and environmental impact) whilst reasonable alternatives for development of other sites with reduced detrimental impacts to the community exist.</p> <p>2) Not Consistent with National Planning Policy Framework December 2023</p> <p>a) Section 8. Promoting healthy and safe communities, &gt; provision of safe and accessible green infrastructure. Promoting SP11 (particularly SP11 1 &amp; 2) as a Nature reserve or Country park is an unmissable opportunity to serve an increasing local population with nearby accessible countryside, promoting healthier physical and mental lifestyles.</p> <p>(Reference Sandilands Golf Club on the Lincolnshire coast near Sutton-on-Sea, Where the NT will transformed the former golf course into a 25-hectare (62 acre) wetland nature reserve.)</p> <p>b) Section 12. Achieving well-designed and beautiful places, SP11 site will be over developed to claim it can still function as a country park. Possibly if SP11 1 &amp; 2 were omitted there would be sufficient open green space left to justify the label of a small country park - Currently there is an expanse of beautiful green land / countryside, the development plan of four large developments SP11-1,2,3 &amp; 4 will ruin the vista and natural feel of open land. The proposed developments will have a feel of housing estates separated by small patches of green doubling the population of Keele</p> <p>c) Section 13. Protecting Green Belt land &gt; This is not just green belt land it as close as we in NUL get to a small AONB and it is accessible to the local population to enjoy. Even if all avenues for developing Brown field sites are limited then there are still some areas of green belt that should be ring-fenced and protected (possible developed as country parks and promoted as such for benefit of the wider Populus)</p> <p>d) Section 15. Conserving and enhancing the natural environment. The plans make a mockery of the intent of this section. The land in SP11 is now rich in a variety of trees and fauna and such be protected as such. there are other areas of green belt that could be taken with lower impact, e.g. scrub or farm land.</p> <p>e) Section 14. Meeting the challenge of climate change.... &gt; The plans make a mockery of the intent of this section. Continued below (scroll down)....</p> <p>The land in SP11 is now rich in a variety of trees and fauna and such be protected as such.</p> <p>There are other areas of green belt that could be taken with lower impact on natural Carbon sequestration , e.g. scrub or farm land.</p> <p>f) Development of Sp11 particularly SP11 1 &amp; 2 would be a tragic missed opportunity to convert this site to a nature reserve or country park and actively promoted as such. Other councils have successfully converted old golf courses RE Sandilands. This sites location is convenient and accessible to the wider NUL population. Once developed its likely this land will be lost forever and will not be able to be reclaimed.</p> <p>g) The national policy Framework does not advocate the easiest or most commercially advantageous routes for the local council, e.g. to prioritise development land that is already in ownership of the council.</p> <p>h) After the environmental &amp; public health disaster of Wallies quarry landfill the "Authorities" owe the NUL community and NUL Green belt and should make amends by improved more sympathetic management and preservation of our green spaces.</p> <p>i) Section 11. Making effective use of land - Urban renewal - development of existing &amp; brown field sites should be prioritised before our green belt is touched.</p> <p>j) Impacts of excessive Traffic to the A525 Keele Road would be unacceptable if all the Development's within the SP11 KL13 &amp; KL15 were to take place.</p> <p>k) The SP11 developments of 900 dwellings will more than double the Keele population (last census 2021 - 2606 people, i don,t think this is fair do you?</p>
<b>Q7 Modification</b>	<p>Suggestions:</p> <p>1) Development of other areas:</p> <p>a) Further development of more land to the East of SP 23 - not sure why this is marked as protected as its just used for grassing</p> <p>b) selected Development of other Farm or scrub land in the NUL area. For instance the TB19 development is more easily justified.</p> <p>c) Selecting more sites like TB19 that are not efficiently farmed or used as recreational areas by the general Populous</p> <p>c) Selected Development of the outlying NUL villages to build them to a size where they can viably sustain some minimal community resources eg a primary school, doctors, pub, shop etc etc. Future developers could be forced to contribute to this as part of planning permissions.</p>

	<p>2) Urban renewal - development of existing &amp; brown field sites should be prioritised before our green belt is touched. This should be a golden rule!</p> <p>3) Scaling back the development of some areas to be more sympathetic to the environment &amp; community eg canceling SP1&amp;2, but continuing SP3&amp;4 at a capped 300 dwelling limit.</p> <p>4) If any development does take place on any NUL green belt, I strongly suggest that the building contractors are under penalty clauses for any damage to green belt or felling of trees that are not strictly essential, I have seen too many developments where the first act is to fell all trees within the site boundary whether essential or not.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure my views and the view of others are taken seriously and given sufficient air-time.
<b>Comment ID</b>	NULLP165
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Family Name</b>	Jervis
<b>Consultee Given Name</b>	Tom
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Final Draft Local Plan Representation Form - (T Jervis 28/09/2024)</p> <p>Continuation Sheet</p> <p>Part B – separate continuation sheet for KL15 representation.</p> <p>Section 6.</p> <p>I Strongly oppose the Keele development (KL15) based on Soundness of plan, which I consider wholly inappropriate, and unjustifiable.</p> <p>1) Not Justified</p> <p>a) KL15 can't be justified due to the impacts (public parkland and environmental impact) whilst reasonable alternatives for development of other sites with reduced detrimental impacts to the community exist.</p> <p>b) Keele University have already started developing KL13 and any development of KL15 cannot be justified while space exists in KL13 (note these developments in KL13 are not shown on the local Plan Map - Why Not?) There are also other derelict areas of Keele site left in brownfield state (Horwood old carpark).</p> <p>c) Other Areas of Keele Site should be redeveloped first before attacking any green belt. Reference Existing planning application 18/00698/CN07)</p> <p>2) Not Consistent with National Planning Policy Framework December 2023</p> <p>a) Section 8. Promoting healthy and safe communities, &gt; provision of safe and accessible green infrastructure.</p> <p>KL15 is frequently used by many local walkers / dog owners. KL15 and the surrounding woodland serves the local community as a valuable and beautiful open green space on the edge of the Westlands (Paris Avenue) and acts as a green / natural separation/bridge between or into the Keele Site from the Westlands.</p> <p>b) Sections 11,13,14 &amp; 15 are also relevant as described in my SP11 representation.</p> <p>c) Impacts of excessive Traffic to the A525 Keele Road would be unacceptable if all the Deveopment's within the SP11 KL13 &amp; KL15 were to take place.</p>
<b>Q7 Modification</b>	<p>Suggestions:-</p> <p>1) Development of other areas within the very spacious Keele site:</p> <p>a) As mentioned above - Keele University have already started developing KL13 and any development of KL15 cannot be justified while space exists in KL13 or other parts of Keele site. There are also other derelict areas of Keele site left in brownfield state (Horwood old carpark).</p> <p>b) Other Areas of Keele Site should be redeveloped first before attacking any green belt. Reference Existing planning application 18/00698/CN07)</p> <p>2) Urban renewal - development of existing &amp; brown field sites should be prioritised before our green belt is touched. This should be a golden rule!</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To ensure my views and the view of others are taken seriously and given sufficient air-time.

<b>Comment ID</b>	NULLP947
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Member of Parliament for Newcastle-under-Lyme
<b>Consultee Family Name</b>	Jogee MP
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p>Across Newcastle-under-Lyme, and the wider North Staffordshire area, special educational needs (SEND) services are coordinated through various initiatives designed to support children and young people with disabilities. I have been contacted by dozens of residents with distressing stories of not being able to be assessed or have the support put in place for their child. Indeed, many schools leaders report of being exasperated at the backlog and capacity issues.</p> <p>One local school told me last week how some 30% of their learners had SEND requirements yet only 7% had plans in place. Whilst clearly the government has a role to play in getting to grips with the situation it has inherited by the last administration, local government has a fundamental role.</p> <p>The plan as presented proposes significant expansion of the local population but fails to set out how education will be supported. We need to see much more detail in the plan so that I can work with you to address some of the structural failings.</p> <p>I welcome the commitment to delivering affordable housing. There is a huge demand for affordable housing within the borough and I know from my meetings with Aspire Housing that there are long waiting lists for social housing from families in need of affordable accommodation.</p> <p>It is clear that historically the Council generally works with housing developers and other stakeholders to facilitate affordable housing projects, but these have not met the demand. Therefore I am keen to see more detail on how the quantity and quality of affordable homes and rents will be delivered within the plan.</p> <p>I have received many complaints about the poor state of the roads in Newcastle, such as Orme Road, Stanier Street, Bower End Lane and numerous roads in Town and Knutton.</p> <p>Many residents report the delays in getting urgent repairs actioned or roads resurfaced. The delivery of 8,000 new homes creates significant additional pressures on this critical area of infrastructure, therefore I would like to see more detailed plans for the delivery of road implementation, maintenance and repair alongside the associated infrastructure and utilities, in particular how the council has collaborated with neighbouring local authorities, infrastructure providers and environmental bodies.</p> <p>Alongside this the issue of localised flooding must be considered. It is clear to me that when developments take place and persistent flooding occurs the local authority (County Council) have failed to remedy the issues; take for example the many residents who have raised flooding outside their homes and on the A525 at Bar Hill, or Bradwell Lane.</p> <p>When proposing new areas of development we need to ensure that there is sufficient plans, capacity, resources and resilience to manage flood risk, and I hope to see evidence brought forward on where this collaboration and cooperation with stakeholders has taken place.</p> <p>There is a lot of work being undertaken by Staffordshire Integrated Care Board, NHS England, and Clinical Commissioning Group for new or improved services within our borough. The local plan seems light on detail on where these services may be located and what infrastructure will be required, despite these being key to accessing healthcare provision and the wider societal wellbeing.</p> <p>I would welcome more detail within the plan on how health and care services will be delivered for current residents and new communities that will be created within the plan.</p>
<b>Comment ID</b>	NULLP949
<b>Order</b>	66
<b>Number</b>	8
<b>Title</b>	Employment
<b>Consultee Company / Organisation</b>	Member of Parliament for Newcastle-under-Lyme
<b>Consultee Family Name</b>	Jogee MP
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Employment
<b>Q6 Details</b>	<p>The need for economic growth is the key to the prosperity of the borough. This is true in many cases, whether that be the regeneration and diversification of our Town centre or bringing job opportunities to our rural communities.</p> <p>Newcastle-under-Lyme has a long and rich</p>

	<p>industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services.</p> <p>I want to work with the Council to identify areas of emerging markets to bring the job creation to the borough, but the council strategy appears to be solely focussed on the warehouse and distribution sector – with its focus on green belt land in Audley.</p> <p>The Audley or AB2 proposal has generated significant public opposition - very legitimately so - and I would therefore like to see what alternative proposals have been explored within the plan. Not least when we have to protect our valuable and much loved green spaces.</p>
<b>Comment ID</b>	NULLP946
<b>Order</b>	85
<b>Number</b>	10
<b>Title</b>	Infrastructure and Transport
<b>Consultee Company / Organisation</b>	Member of Parliament for Newcastle-under-Lyme
<b>Consultee Family Name</b>	Jogee MP
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Infrastructure and Transport
<b>Q6 Details</b>	<p>It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.</p> <p>I have received representations from residents in Audley, Betley and Balterley regarding the lack of public transport provision in the borough's rural communities.</p> <p>Residents in Bradwell have raised the issue of difficulties in accessing healthcare provisions. In all of the cases raised with me, the cuts to local bus services, combined with the lack of alternative provisions, need addressing whilst also planning for future expansion of communities.</p> <p>Moving forward, I would like to see more detailed collaboration with transport providers across the North Staffordshire conurbation to deliver for – and properly connect - residents and businesses.</p>
<b>Comment ID</b>	NULLP948
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Member of Parliament for Newcastle-under-Lyme
<b>Consultee Family Name</b>	Jogee MP
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>I welcome the commitment to delivering affordable housing. There is a huge demand for affordable housing within the borough and I know from my meetings with Aspire Housing that there are long waiting lists for social housing from families in need of affordable accommodation.</p> <p>It is clear that historically the Council generally works with housing developers and other stakeholders to facilitate affordable housing projects, but these have not met the demand. Therefore I am keen to see more detail on how the quantity and quality of affordable homes and rents will be delivered within the plan.</p>



<b>Comment ID</b>	NULLP1371
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Alan
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1425
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Any area designated as a Green Belt should be forever. Never to be altered no matter what for. Without these areas there would be a decline in all nature and to the environment. We need these areas to help in maintaining a livable atmosphere not just for now but for many years to come. I shudder to think what the future will the next generation encounter without areas like Green belts.</p> <p>To put 700 odd houses in that area (CT1) and even more in TK30 (Deans Lane) area the infrastructure has not been taken into account. The traffic through Red Street is getting worse not only at week ends and early mornings but even during a normal day because of cars parked. Is there anywhere else a bus service has to detour in the afternoons at school finishing times</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP710
<b>Order</b>	83
<b>Title</b>	Policy RET5: Kidsgrove Town Centre
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Policy RET5 provides the context for the regeneration of Kidsgrove town centre, and as such is a vitally important policy. However, as drafted, it is simply designed to support public sector-led interventions and projects and while these are welcomed, the policy needs to be much broader in order to stimulate further investment and development. Indeed, given the aspiration to drive the regeneration of Kidsgrove, the overall policy context – including the housing target detailed within Policy PSD3 – is somewhat lacking. Gaps within Policy RET5 included opportunities to diversify the town centre's offer beyond retail and other associated uses, and the importance of increased residential development, particularly in locations that benefit from public transport links to the town centre.
<b>Q7 Modification</b>	<p>Given the Council's aspirations to drive the regeneration of Kidsgrove town centre, we consider that Policy RET5 is somewhat limited, and is not broad enough to deliver meaningful change. As such, we consider that Policy RET5 should be modified by adding the following to point 1 of the policy:</p> <ul style="list-style-type: none"> <li>• Support for opportunities to diversify the town centre offer by introducing other compatible uses in appropriate locations, including residential In addition, a point 2 should be added to the policy as follows:</li> <li>• The Council will support increased residential development in locations that benefit from good public transport links with the town centre and that will support the area's economic growth and the town centre's regeneration</li> </ul>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP704
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	We consider that the overall development strategy that underpins the draft Local Plan to be flawed for the following reasons. While the two key employment allocations in the draft Local Plan are acknowledged – 'Land at Junction 16 of the M6' (Policy AB2), and 'Keele Science Park Phase 3' (Policy KL13) – the importance of 'Chatterley Valley, Lowlands Road' (Policy BW1) appears to be downplayed. However, the Chatterley Valley site and the proposed Junction 16 allocation are both located off the A500 corridor, and therefore provide the economic context for growth in the north of the borough.

	<p>A further key consideration relating to the proposed Chatterley Valley allocation is that it is located within the northern extremity of the Ceramic Valley initiative, a cross-boundary project led by the Borough Council, Stoke-on-Trent City Council and Staffordshire County Council. Therefore it is in this part of the North Staffordshire conurbation where the majority of recent and planned economic activity is taking place, and thus where a large proportion of the area's employment opportunities will be located.</p> <p>Alongside this, Policy RET5 (Kidsgrove Town Centre) provides the policy context for the regeneration of Kidsgrove town centre, and while the principle of this is to be supported, the detail is in need of strengthening (this is considered below).</p> <p>However, the plan's proposed housing land supply does not respond to this economic context, and neither does it respond to the Council's new mandatory housing target (this is considered below) which should address historic under-delivery across the borough, particularly affordable housing. It should also be noted that significant levels of student accommodation are included within the proposed housing land supply. Therefore it is considered that the plan's proposed housing supply will need to be increased accordingly. Having considered the above, Policy PSD1 will need to be addressed accordingly. Suggested amendments are detailed below. In addition, the shortcomings of Policy PSD1 also impact on Policy SD3 and resulting Site Allocations.</p>
<b>Q7 Modification</b>	<p>Point 1 will need to be amended to reflect the Council's new mandatory housing target. This will need to be addressed as there is a significant difference between that, and the figure that the Regulation 19 draft is responding to.</p> <p>Initial indications suggest the following:</p> <ul style="list-style-type: none"> <li>• 11,860 for the plan period 2020-2040</li> <li>• 593 dwellings per annum</li> </ul> <p>Therefore point 1 within Policy PSD1 should be modified as follows: "A minimum of 11,860 dwellings will be delivered in the Borough over the Plan period 2020–2040 which equates to 593 dwellings per annum."</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing. In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.</p>
<b>Comment ID</b>	NULLP708
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condante Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	National policy regarding affordable housing as detailed in the NPPF consultation and changes the emphasis on affordable housing provision towards social rent, and will remove the requirement to provide First Homes. As such, Policy HOU1 will need to be revised.
<b>Q7 Modification</b>	<p>As detailed above, National policy related to affordable housing is being refocused through revisions to the NPPF, including the removal of requirements to provide First Homes. Therefore Policy HOU1 will need to be modified, and this can be done through the removal of point 3 from the policy, deletion of paragraph 7.3, and modification of paragraph 7.4.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing. In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.</p>
<b>Comment ID</b>	NULLP705
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development

<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>As drafted, the plan provides for 8,000 homes over the plan period (400 dwellings per annum), based on the following spatial distribution:</p> <ul style="list-style-type: none"> <li>• Strategic Centre of Newcastle-under-Lyme – 5,200 dwellings;</li> <li>• Urban Centre of Kidsgrove – 800 dwellings;</li> <li>• Audley and Bignall End – 250 dwellings;</li> <li>• Betley and Wrinehill/Madeley and Madeley Heath – 250 dwellings;</li> <li>• Loggerheads – 450 dwellings;</li> <li>• Baldwins Gate – 250 dwellings; and</li> <li>• Keele and Keele University – 800 dwellings.</li> </ul> <p>As detailed above, we consider that is lower than it should be as it does not respond to the Council's new mandatory housing target, and the proposed supply contains significant levels of student accommodation.</p> <p>Setting aside issues associated with the plan's overall housing number, the distribution of development from a spatial perspective is flawed. Two of the plan's key economic drivers – Land at Junction 16 of the M6, and Chatterley Valley, Lowlands Road – are located within the north of the borough along the A500 corridor, while the plan also provides the policy context for the regeneration of Kidsgrove town centre. However, while it is acknowledged that the northern area of the Strategic Centre of Newcastle-under-Lyme will provide a certain level of the housing requirement in support of these allocations, the closest areas from a spatial perspective are Audley and Bignall End, and the Urban Centre of Kidsgrove, the two combined provide just 1,050 homes, or 13.1% of the overall proposed housing land supply. This is clearly an unbalanced approach, particularly taking into consideration public transport connections.</p> <p>It is also noted that the housing number associated with the Strategic Centre of Newcastle-under-Lyme incorporates an 'urban extension' which is detailed in Policy SP11 (Lyme Park, Silverdale) and is associated with the proposed development of the Keele Municipal Golf Course to provide 900 homes within a country park setting. The justification of the release of the golf course from the Green Belt was based around the extension of the Keele Science Park, and the growth aspirations of Keele University. However, while the extension of Keele Science Park still appears to be deliverable, the growth aspirations of the university would appear to be facing some serious challenges linked to the funding crisis facing the higher education sector, and the post-Brexit challenges facing international students. Indeed, in May 2024, Keele University invited 2,300 members of staff to consider voluntary redundancy. Therefore, the major Green Belt release that underpins the proposed urban extension is unjustified in the current context. Therefore it is considered that Policy PSD3 requires amendment to properly respond to the plan's proposed economic strategy and any increase in the Council's housing target. Suggested amendments are detailed below.</p>
<b>Q7 Modification</b>	<p>Policy PSD3 will be the most complex to address and it will require the Council to carry out some 'homework' and detailed analysis in terms of the unbalanced nature of the distribution of development in the context of the key economic drivers in the north of the borough, and the new mandatory housing target.</p> <p>While the new mandatory housing target may well mean increased housing numbers across all areas of the borough, particular attention will need to be paid to the Urban Centre of Kidsgrove.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing. In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.
<b>Comment ID</b>	NULLP709
<b>Order</b>	58
<b>Title</b>	Policy HOU8: Rural and First Homes Exception Sites
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl



<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU8
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	While we would not disagree with the principle of Rural Exception Sites, as referred to be above, national policy is changing in respect of the provision of affordable housing and the requirement to provide First Homes will be removed. As such, Policy HOU8 will need to be revised.
<b>Q7 Modification</b>	As discussed in relation to Policy HOU1, national policy in respect of affordable housing is changing including the removal of requirements to provide First Homes, and therefore Policy HOU8 will need to be modified accordingly. This can be achieved by removing 'First Homes' from the title of the policy, and deletion of point 2 from the policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing. In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.
<b>Comment ID</b>	NULLP707
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Concerns regarding the Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment produced by Arup in 2017 have been raised in previous representations, and those concerns still remain.</p> <p>But more fundamentally, Green Belt policy is changing from a national perspective, and while a brownfield first policy remains, there will now be a requirement for local planning authorities to identify 'grey belt' – essentially previously developed land located in the Green Belt – and lower quality Green Belt land that could be released should the need be there.</p> <p>However, although the Council has already acknowledged the need to release land from the Green Belt to meet the plan's development requirements, while the new mandatory targets will inevitably mean the need to release further land for development. In the first instance this should at least mean the reinstatement of sites that were allocated in the Regulation 18 draft.</p> <p>In this context, it is considered that the 2017 Green Belt Assessment is out-of-date and will need to be revisited in order to focus on the identification grey belt and lower quality Green Belt land. Policy PSD5 sets out how and where the Green Belt boundary will be amended in the Local Plan. However, the policy will need to be modified in the context of required modifications to Policies PSD1 and PSD3, and changes to the approach to Green Belt release at a national level through the revised NPPF, as detailed above. It should also be noted that the Council has already demonstrated exceptional circumstances to justify Green Belt release, as evidenced by proposed site allocations.</p>
<b>Q7 Modification</b>	As with Policy PSD3, Policy PSD5 will be complex to address as it will need to respond to other policy modifications – specifically Policies PSD1 and PSD3 – and the new mandatory housing target. This will inevitably mean further amendments to the Green Belt boundary, and while it is not appropriate to discuss specific sites at this point, the starting point should be:

	<ul style="list-style-type: none"> <li>• Reinstatement of sites that were allocated in the Regulation 18 draft but removed ahead of the publication of the Regulation 19 draft; and</li> <li>• A review of the 2017 Green Belt Assessment in order to identify grey belt sites, and lower quality Green Belt sites, with a particular focus on the north of the borough given the unbalanced distribution of housing land supply. The above will then inform the required modifications to Policy PSD5, which will also inform any new site allocations.</li> </ul>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing. In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.
<b>Comment ID</b>	NULLP711
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	J.Two Ltd
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Andrew and Karl
<b>Agent Company / Organisation</b>	Condate Limited
<b>Agent Position</b>	Projects Director
<b>Agent Family Name</b>	Proudlove
<b>Agent Given Name</b>	Dave
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>While the consultation on the Regulation 19 draft is not the place for detailed debate in respect of specific sites, the flaws identified above – particularly in respect of Policies PSD1 and PSD3 – the Council's new mandatory housing target, and the forthcoming changes to the NPPF have obvious implications for the plan's housing land supply and subsequent site allocations, and there will be a need to identify additional sites for development, particularly in the north of the borough.</p> <p>In order to address this, the starting point should be:</p> <ul style="list-style-type: none"> <li>• Reinstatement of sites that were allocated in the Regulation 18 draft but removed ahead of the publication of the Regulation 19 draft; and</li> <li>• A review of the 2017 Green Belt Assessment in order to identify grey belt sites, and lower quality Green Belt sites, with a particular focus on the north of the borough given the unbalanced distribution of housing land supply. The modification(s) considered necessary to make the Local Plan legally compliant and sound, in respect of legal compliance or soundness matters identified above</li> </ul>
<b>Q7 Modification</b>	<p>Although it is not appropriate to debate specific site allocations during consultation on the Regulation 19 draft, the issues and necessary modifications identified will inevitably require an increased housing land supply, and thus further site allocations.</p> <p>Following the modification of Policies PSD1, PSD3 and PSD5, it is considered that the following key principles should underpin this process:</p> <ul style="list-style-type: none"> <li>• Reinstatement of sites that were allocated in the Regulation 18 draft but removed ahead of the publication of the Regulation 19 draft; and</li> <li>• Identification of grey belt sites, and lower quality Green Belt sites, with a particular focus on the north of the borough given the unbalanced distribution of housing land supply.</li> </ul>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>We consider that it is necessary for us to participate in the examination hearing session(s) as we are promoting a site that was allocated in the Regulation 18 draft, yet removed from the Regulation 19 draft despite nothing changing.</p> <p>In addition, we have further evidence to present within our hearing statement to reinforce the deliverability of the site, and the weaknesses of the plan as drafted.</p>

<b>Comment ID</b>	NULLP466
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Elizabeth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I wish for the Planning inspector to remove sites AB2, AB33, AB15 and AB12 from the plan for the following reasons:</p> <ol style="list-style-type: none"> <li>1 The extra number of cars that would be generated in the local area from sites AB12, AB15, AB33 alongside the larger development at Red Street would be completely unfeasible on our local inefficient roads. Employees travelling by vehicle to site AB2 would avoid the A500 and try to access the site via our local roads through Bignall End and Audley, along Alsager Road. This would be to avoid the traffic jams that accumulate due to consistent traffic issues on the M6 and at junction 16. This already happens when there are problems on the M6. This extra traffic travelling to and from site AB2, along with the potential minimum of 125-250 extra cars generated by site AB12 in our village, not to mention the extra cars from sites AB33 and AB15 and also cars from the huge development at red Street, which may use our local village roads for travel is absolutely untenable. This swathe of developments in such a small local area is unsound, greedy and completely impractical.</li> <li>2 The proposed access to site AB12 via Diglake Street is a nonsense idea. To expect all residents of Diglake Street to park in a tiny car park at the bottom of the road is completely unfair. I cannot understand how a disabled person living at the top end of this street should be expected to park at the bottom and carry their shopping to the top. The amount of cars that would need to enter the very small street to access the existing and new homes, would make it impossible to cross the street safely and would be a complete noise and pollution nuisance in such a cramped area. The disruption to the local childrens' play area due to noise, construction and pollution would be completely unfair. The land which is proposed for development is productive farmland and it contributes highly to the greenbelt. It also supports the mental health and well-being of local residents, especially children, due to the beauty of the green space. I would no longer feel that I could take my child to play at the childrens' play area next to the building site, due to the traffic and pollution risks. It is completely unacceptable to place local residents in this position! This proposed access is NOT a result of sensible planning and forethought. Rather, it is a desperate attempt to shoe-horn as many council tax-generating properties as possible into a totally unsuitable area.</li> <li>3 As a (redacted by admin) I am extremely concerned about my journey to work, having to navigate and mitigate the extreme volume of traffic that would be generated, in order to get out of my village to get to work. This is a local, rural village, not a town. It is untenable. In addition, the danger of crossing local roads will be seriously multiplied and I can envisage serious accidents taking place. The local Bignall End/Audley roads simply cannot take the proposals.</li> <li>4 The developments in their entirety would completely alter the rural status of our local area. The proposals do not seek to support locals in finding suitable and well-placed starter/retirement accommodation that is in keeping with the village, but rather, they seek to generate as much income for the council as possible, without due regard to traffic and highways implications, as well as no real regard for increased school places, doctors and dentist provision, local roads or amenities.</li> <li>5 As an example, I cannot see how the extra traffic that will appear on Ravens Lane Bignall End has been taken into consideration, in terms of how congested it already is at the best of times. Residents' cars are all parked on the main road, which makes it difficult to pass even now. How will this road cope with a possible 125-250 more cars from site AB12 and further traffic from the other local developments?</li> <li>6 The pollution and noise generated by development AB12 would be dreadful for local residents. In addition to this, I would fear for (redacted by admin) accessing (redacted by admin) on foot, due to the huge increase in traffic. The congestion that would be caused at the entrance to Diglake Street and its surroundings from construction vehicles and the eventual extra cars/vans, would be unbearable.</li> <li>7 I cannot see how selling off huge swathes of greenbelt for site AB2 is justified against the loss of wildlife, green space and the pollution that would be created. To remove so much greenbelt in one local area is a travesty to local residents and I do not feel like our feelings are being considered. As I have previously stated on the portal in the previous stage of the consultation, this is not about providing small local developments for locals to be able to remain in their home village. It is about sheer greed. How can it be justified environmentally? Have we not already got enough warehousing space over the junction in Cheshire and close to Bathpool Park?</li> </ol> <p>I would urge the council to seriously consider the impact of these potential developments as a whole, against the extra development at Red Street. We, as residents, have some serious concerns about their impact on our villages and I sincerely hope that our concerns are going to be taken seriously, and that common sense will prevail over money.</p>

<b>Comment ID</b>	NULLP989
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Jennifer Jean
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>The site AB2 is unsound - the site is on J16 of the M6 which is already a congested part of the road network. The A500 is frequently congested at peak times and whenever there is an incident on the M6. This also affects surrounding local roads through Audley.</p> <p>When a traffic count on the roundabout on B5500/Alsager road was carried out for 2 hours the amount of vehicles counted ranged from 1350-1750. This increased significantly on when there was an accident on the A500. If another 200+ houses are built and the AB2 development, this would increase the amount of vehicles using the local roads to unsafe levels. These roads are not built for this amount plus many hgv's and service vehicles, this makes the plan unsound.</p> <p>The M6 Junction 16 cannot accommodate the extra traffic that would be generated by the massive industrial site. The emergency access that is planned for Barthomley Road is both unsound and unjustified. The road is a narrow and windy country lane used by many local residents as a rural walk. The dangerous conditions and damage to the countryside and wellbeing of nature and residents that an increase of traffic including heavy goods and service vehicles cannot be justified.</p> <p>The employment site is said to create thousands of jobs. Jobs in this type of warehousing facility are likely to be replaced by AI and robots in the coming years, therefore the statement that it will create this amount of jobs is also unsound and the irreversible damage this will do to the greenbelt for a short term investment in jobs cannot be justified. The jobs that are created in the short term will create thousands more cars travelling to the site as there are no public transport links. Personal car use will be the only viable way for workers to access the site.</p> <p>The site cannot be justified as the proposal is to remove 80 HA of good quality greenfield for 22HA of employment land. The site is unsound as it is four times larger than the council say that they need. This will lead to the employment / housing ratio becoming unbalanced and this rural community will be faced with more housing development that the infrastructure of the village cannot cope with. There will not be capacity for traffic, schools, health centres and dentists.</p> <p>The plans state that the height, scale and form of the development should reflect the character of the area. This excessively enormous industrial site cannot possibly be deemed to fit the character of this greenbelt rural land. The land is high quality agricultural land that can never be replaced. It supports wildlife and at a time when the world is in a climate crisis, the council should be protecting this land from excessive development. For these reasons, this site is unsound and unjustified.</p> <p>This site is cannot be justified as there are already huge warehouse facilities a very short distance away in Alsager. These warehouses are largely empty. There is also the development at Radway Green. Whilst not in the Newcastle Borough, these industrial areas should be considered in conjunction with the local plan.</p>
<b>Q7 Modification</b>	To make this local plan sound, the AB2 site should be removed from the plan as there are alternative sites that are more appropriate for the aims of the council. The size of the site, the irrecoverable damage it will do to the environment and nature, the increase in HGVs and cars that will congest both the A500, M6 and local roads cannot be justified and makes the plan dangerous, unjustified and unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP80
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Judith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I had assumed this was a consultation paper, designed for the local community to respond to the planned proposal of building houses on plot BL18- locally known as Barney's Field. My objection is outlined below. I hope you are human and not a robot and understand that any type of development on this land would have a negative impact on the local community.</p> <p>Please don't build on this land. The area has been used by the local community for decades, this is evident by the numerous paths throughout the area.</p> <p>Both young and old use this land, it gives access to the wooded area adjacent to the field, the fishing pond and a short cut to Bathpool Country Park.</p> <p>There are not many green open spaces available and given the health benefits of having access to green open spaces it would be devastating to everyone to lose this.</p> <p>Whilst we have Clough Hall Park and Bathpool Country Park, both don't have a large amount of open space.</p> <p>Initially this land was used by Clough Hall School as a sports field, with football and rugby teams also benefitting from it. Once the school reinvented itself the land was allowed to become overgrown. Many attempts were made to the council to cut the grass so the football pitch and rugby pitch could be used by the local community of an evening and weekend, but this did not happen.</p> <p>Since then wildlife has moved in and made a home there. Often you can see birds of prey hovering over the field, looking for the next meal. Rabbits, foxes, frogs, ferrets and a deer have all been spotted.</p> <p>There is a natural spring which runs through the center of the land, and whilst the council have tried to contain it, water as always finds its own route and now floods a lot of the land over the winter months.</p> <p>We don't want this land being tarmacked over to accomodate more cars. And your suggestion of including plans for a football pitch is very biased. Teenagers need somewhere safe to meet not more football pitches, bring back youth clubs and help them see that they are valued.</p> <p>The A34 around Talke and Butt Lane gets very congested with traffic and installing another set of lights, or a roundabout would only add to the congestion especially when the M6 is closed or gridlocked.</p> <p>There are too many brownfield lands standing idle and unused that could be a better solution and would bring new life into an area. Improving visibility and aesthetics to an area that had become unsightly, possible used to dump rubbish and vandalized due to its lack of use.</p>
<b>Q7 Modification</b>	See above as this form does not meet the consultation feedback from local communities, but rather aimed at people who work in the profession.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1158
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I really do not think your future plans for the village of Audley are of any benefit to the local people. When there is any trouble on the A500 or M6 the extra traffic is a nightmare. We have enough problems with the speed of some cars and heavy lorries. I feel with all your proposals will only increase more for our village. I always know when the speed camera van is around as everyone keeps within the speed limit. Thank you
<b>Comment ID</b>	NULLP1160
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I really do not think your future plans for the village of Audley are of any benefit to the local people. When there is any trouble on the A500 or M6 the extra traffic is a nightmare. We have enough problems with the speed of some cars and heavy lorries. I feel with all your proposals will only increase more for our village. I always know when the speed camera van is around as everyone keeps within the speed limit. Thank you
<b>Comment ID</b>	NULLP1161
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I really do not think your future plans for the village of Audley are of any benefit to the local people. When there is any trouble on the A500 or M6 the extra traffic is a nightmare. We have enough problems with the speed of some cars and heavy lorries. I feel with all your proposals will only increase more for our village. I always know when the speed camera van is around as everyone keeps within the speed limit. Thank you
<b>Comment ID</b>	NULLP1159
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Linda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I really do not think your future plans for the village of Audley are of any benefit to the local people. When there is any trouble on the A500 or M6 the extra traffic is a nightmare. We have enough problems with the speed of some cars and heavy lorries. I feel with all your proposals will only increase more for our village. I always know when the speed camera van is around as everyone keeps within the speed limit. Thank you



<b>Comment ID</b>	NULLP609
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>At each stage in the consultation the area of green belt being released, known as AB2, has increased in size. AB2 now includes circa 80 hectares although the use of only 22 hectares has been identified at this stage. How is such a large allocation justifiable purely on a speculative basis? NB the nearest village Audley covers circa 144 hectares so this industrial area will have a definite impact on the character of the village.</p> <p>The developer in discussion with the council is prompting a &lt;&lt;Big Box&gt;&gt; approach to the warehousing and employment solution which directly challenges the requirement for any design structure to be unintrusive by the very nature/size of the structure.</p> <p>While the plan calls for &lt;&lt;appropriate measures&gt;&gt; to control the impact of noise, light, traffic, air pollution etc ... on the local area, which I applaud, the plan therefore acknowledges that there will be an unwanted impact.</p> <p>Evidence provided in the SWECO traffic assessment only looks at accidents in a 1.5Km radius of AB2 however, accidents circa 10 miles away on the M6 can severely impact local roads.</p> <p>within the evidence base SWECOs model has not been suitably validated and reasons have been given for this, but the model is both over and under predicting traffic volumes which I suggest is a concern. I would also question the premise that the model has only been run between 08.00 and 09.00 in the morning as west bound traffic is already queuing to access Junction 16 roundabout from 07.00 daily. I can see no indication within the traffic assessment regarding assumptions made for lorry traffic servicing the AB2 site so believe the evidence is flawed</p> <p>I have seen no evidence that this employment site is necessary, nor evidence that there will be a major benefit to Newcastle Area (other than a monetary boosting of the council purse), as the location will suit a mobile workforce using the road network (M6/A500) not people living in the local area. It must therefore be satisfying a wider perceived requirement which I believe is already addressed but not within the Newcastle - Staffs boarder.</p>
<b>Q7 Modification</b>	<p>Ideally reject the release of Green Belt Land for the employment purposes as the impact on the local area outweighs the benefit.</p> <p>As a minimum, question the scale of the proposed development and the suggested circa 80 hectare Green Belt release so close to a rural village with the view to reducing the amount of area released.</p> <p>Traffic assessment needs to state assumptions on vehicle movements and composition into and out of the proposed site and be clear on the effect this will have on the free flow of the A500. There is no comment on whether a new traffic light controlled junction on the A500 will have any impact on the J16 roundabout and explicitly traffic leaving the M6 to join the A500 east bound, nor how the new junction would back up the A500 west bound toward the Alsager Rd junction.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP990
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Johnson
<b>Consultee Given Name</b>	Philip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>The site AB2 is unsound - the site is on J16 of the M6 which is already a congested part of the road network. The A500 is frequently congested at peak times and whenever there is an incident on the M6. This also affects surrounding local roads through Audley.</p> <p>When a traffic count on the roundabout on B5500/Alsager road was carried out for 2 hours the amount of vehicles counted ranged from 1350-1750. This increased significantly on when there was an accident on the A500. If another 200+ houses are built and the AB2 development, this would increase the amount of vehicles using the local roads to unsafe levels. These roads are not built for this amount plus many hgv's and service vehicles, this makes the plan unsound.</p> <p>The M6 Junction 16 cannot accommodate the extra traffic that would be generated by the massive industrial site. The emergency access that is planned for Barthomley Road is both unsound and unjustified. The road is a narrow and windy country lane used by many local residents as a rural walk. The dangerous conditions and damage to the countryside and wellbeing of nature and residents that an increase of traffic including heavy goods and service vehicles cannot be justified.</p> <p>The employment site is said to create thousands of jobs. Jobs in this type of warehousing facility are likely to be replaced by AI and robots in the coming years, therefore the statement that it will create this amount of jobs is also unsound and the irreversible damage this will do to the greenbelt for a short term investment in jobs cannot be justified. The jobs that are created in the short term will create thousands more cars travelling to the site as there are no public transport links. Personal car use will be the only viable way for workers to access the site.</p> <p>The site cannot be justified as the proposal is to remove 80 HA of good quality greenfield for 22HA of employment land. The site is unsound as it is four times larger than the council say that they need. This will lead to the employment / housing ratio becoming unbalanced and this rural community will be faced with more housing development that the infrastructure of the village cannot cope with. There will not be capacity for traffic, schools, health centres and dentists.</p> <p>The plans state that the height, scale and form of the development should reflect the character of the area. This excessively enormous industrial site cannot possibly be deemed to fit the character of this greenbelt rural land. The land is high quality agricultural land that can never be replaced. It supports wildlife and at a time when the world is in a climate crisis, the council should be protecting this land from excessive development. For these reasons, this site is unsound and unjustified.</p> <p>This site is cannot be justified as there are already huge warehouse facilities a very short distance away in Alsager. These warehouses are largely empty. There is also the development at Radway Green. Whilst not in the Newcastle Borough, these industrial areas should be considered in conjunction with the local plan.</p>
<b>Q7 Modification</b>	To make this local plan sound, the AB2 site should be removed from the plan as there are alternative sites that are more appropriate for the aims of the council. The size of the site, the irrecoverable damage it will do to the environment and nature, the increase in HGVs and cars that will congest both the A500, M6 and local roads cannot be justified and makes the plan dangerous, unjustified and unsound.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1020
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q6 Details</b>	<p><b>Cllr Dave Jones (Keele Ward) Response to Newcastle-under-Lyme Draft Local Plan</b></p> <p>I want to place on record my thanks to officers at the council over the work that has gone into the preparation of the regulation 19 local plan.</p> <p>As leader of the opposition group, I have submitted a formal response on behalf of the group that outline concerns with elements of the plan in general. Areas that we feel lack significant commitment from the council to ensure the impact of the proposed developments are mitigated sufficiently. In this response I will focus on concerns regarding the plan and the impact on the communities of Keele, Silverdale and the surrounding villages and centres. I have grouped these into specific themes:</p> <p>Significant Housing development in Keele and the surrounding areas (Sites SP11, SP23 and TB19): Taken together the plan seeks to develop approximately 1650 dwellings across these sites. These developments will place significant pressure on existing infrastructure, including the road network and health facilities. Within the plan, the only commitment to improving the road network is for a link road between the A525 and A53. I have significant concerns that given the extensive additional dwellings, combined with the pressures of commuter traffic to the university, this measure will fail to address the significant pressures on existing road network around Keele Bank, Silverdale and Milhouse.</p> <p>The SWECO report on transport modelling identifies this as a key issue. Under their modelled scenarios, assuming the link road does transfer the pressure off Keele Bank, and assuming a significant uptake of the new bus routes to Keele, that the additional burden of these dwellings will reduce the impact to the existing road network as at capacity. I have significant concerns that this ideal scenario will not unfold, and therefore these developments will have significant impact in worsening the current situation.</p> <p>The local plan refers to an integrated transport solution, with little detail as to how this will be implemented. We know that public transport in this part of the borough is heavily reliant on the bus network. I have significant concerns about the efficacy of public transport solutions, reliant on buses, due to the significant traffic pressures seen under current levels of dwellings. The introduction of 1650 dwellings will further increase the pressure, impacting on bus journey times and making the only public transport system less attractive.</p> <p>The cascade impact of these dwelling will be felt most acutely in the village of the Silverdale. With pressures on traffic exiting these developments via Keele Bank, most traffic will redirect through Silverdale village. The existing road network in Silverdale struggles with the pressure of continued development, and no improvements to the road network. The roads that link the northern segment of Silverdale village with the proposed developments on Keele Golf course are not designed for heavy traffic use.</p> <p>The undulated nature of the road network, coupled with on street parking will become a pressured rat run during peak commuting hours, place undue pressure on the residents of Silverdale.</p> <p>I am disappointed that a plan proposing to build a significant concentration of dwellings has not put forward a plan for improvement to the highway network. The lack of a tangible plan to mitigate these impacts, along with over-reliance on 106 funding to support transport improvements is a significant weakness that needs addressing before permission can be granted for these sites.</p> <p>The pressure on GP provision has not been appropriately assessed in this plan. The area benefits from two GP surgeries, one in Silverdale and one on the Keele University campus. I am led to believe that the new surgery proposed for the Golf Course developments will be a relocation of the Keele campus surgery, and therefore not additional provision. I have concerns that under the proposed developments, residents will struggle with provision of GP coverage.</p> <p>Further general concerns on the local plan are covered in the opposition group response. I would also draw the inspectors attention to the formal response submitted by Keele and Silverdale Parish Councils, Cllr Jacqueline Brown, and Save our Green Spaces (SoGS).</p>
<b>Comment ID</b>	NULLP1018
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p><b>Cllr Dave Jones (Keele Ward) Response to Newcastle-under-Lyme Draft Local Plan</b></p> <p>I want to place on record my thanks to officers at the council over the work that has gone into the preparation of the regulation 19 local plan.</p> <p>As leader of the opposition group, I have submitted a formal response on behalf of the group that outline concerns with elements of the plan in general. Areas that we feel lack significant commitment from the council to ensure the impact of the proposed developments are mitigated sufficiently. In this response I</p>

will focus on concerns regarding the plan and the impact on the communities of Keele, Silverdale and the surrounding villages and centres. I have grouped these into specific themes:

Significant Housing development in Keele and the surrounding areas (Sites SP11, SP23 and TB19): Taken together the plan seeks to develop approximately 1650 dwellings across these sites. These developments will place significant pressure on existing infrastructure, including the road network and health facilities. Within the plan, the only commitment to improving the road network is for a link road between the A525 and A53. I have significant concerns that given the extensive additional dwellings, combined with the pressures of commuter traffic to the university, this measure will fail to address the significant pressures on existing road network around Keele Bank, Silverdale and Milhouse.

The SWECO report on transport modelling identifies this as a key issue. Under their modelled scenarios, assuming the link road does transfer the pressure off Keele Bank, and assuming a significant uptake of the new bus routes to Keele, that the additional burden of these dwellings will reduce the impact to the existing road network as at capacity. I have significant concerns that this ideal scenario will not unfold, and therefore these developments will have significant impact in worsening the current situation.

The local plan refers to an integrated transport solution, with little detail as to how this will be implemented. We know that public transport in this part of the borough is heavily reliant on the bus network. I have significant concerns about the efficacy of public transport solutions, reliant on buses, due to the significant traffic pressures seen under current levels of dwellings. The introduction of 1650 dwellings will further increase the pressure, impacting on bus journey times and making the only public transport system less attractive.

The cascade impact of these dwelling will be felt most acutely in the village of the Silverdale. With pressures on traffic exiting these developments via Keele Bank, most traffic will redirect through Silverdale village. The existing road network in Silverdale struggles with the pressure of continued development, and no improvements to the road network. The roads that link the northern segment of Silverdale village with the proposed developments on Keele Golf course are not designed for heavy traffic use.

The undulated nature of the road network, coupled with on street parking will become a pressured rat run during peak commuting hours, place undue pressure on the residents of Silverdale.

I am disappointed that a plan proposing to build a significant concentration of dwellings has not put forward a plan for improvement to the highway network. The lack of a tangible plan to mitigate these impacts, along with over-reliance on 106 funding to support transport improvements is a significant weakness that needs addressing before permission can be granted for these sites.

The pressure on GP provision has not been appropriately assessed in this plan. The area benefits from two GP surgeries, one in Silverdale and one on the Keele University campus. I am led to believe that the new surgery proposed for the Golf Course developments will be a relocation of the Keele campus surgery, and therefore not additional provision. I have concerns that under the proposed developments, residents will struggle with provision of GP coverage.

**Pre-determination of Golf Course developments:** I have significant concern that the inclusion of parcels of land on the former Golf Course have been made based on pre-determination. For reference, the decision to designate the former Golf Course as an asset for disposal was made by the same members of cabinet who approved the site to be included in the local plan. This asset sits within the Green Belt, providing the main green space between the villages of Keele and Silverdale, and critically contributes significantly to the biodiversity of the borough. The inclusion of this site for housing development, and thus it's removal from the green belt, will net significant funds for the council. As the local councillor I have raised this question at every opportunity and have never received a clear answer as to how the cabinet members have avoided pre-determination of the inclusion of this site. Notably, should cabinet wish to avoid concerns over pre-determination, they would need to isolate themselves from the site selection process. This has not happened and thus the inspector must be satisfied that the inclusion of this site, over other sites put forward by officers, has not been pre-determined by the value of asset realisation.

**Golf Course country park:** I welcome the recognition of the part of the Golf Course site as a country park. However, under this plan the site will be removed from the green belt and thus run risk of future development. I would propose to the inspector that given the significant benefit of the biodiversity at this site, that should the inspector be minded approving this development that the country park remain within the green belt and thus protected from future development.

Further general concerns on the local plan are covered in the opposition group response. I would also draw the inspectors attention to the formal response submitted by Keele and Silverdale Parish Councils, Cllr Jacqueline Brown, and Save our Green Spaces (SoGS).

<b>Comment ID</b>	NULLP1019
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p><b>Cllr Dave Jones (Keele Ward) Response to Newcastle-under-Lyme Draft Local Plan</b></p> <p>I want to place on record my thanks to officers at the council over the work that has gone into the preparation of the regulation 19 local plan.</p> <p>As leader of the opposition group, I have submitted a formal response on behalf of the group that outline concerns with elements of the plan in general. Areas that we feel lack significant commitment from the council to ensure the impact of the proposed developments are mitigated sufficiently. In this response I will focus on concerns regarding the plan and the impact on the communities of Keele, Silverdale and the surrounding villages and centres. I have grouped these into specific themes:</p>

Significant Housing development in Keele and the surrounding areas (Sites SP11, SP23 and TB19): Taken together the plan seeks to develop approximately 1650 dwellings across these sites. These developments will place significant pressure on existing infrastructure, including the road network and health facilities. Within the plan, the only commitment to improving the road network is for a link road between the A525 and A53. I have significant concerns that given the extensive additional dwellings, combined with the pressures of commuter traffic to the university, this measure will fail to address the significant pressures on existing road network around Keele Bank, Silverdale and Milhouse. The SWECO report on transport modelling identifies this as a key issue. Under their modelled scenarios, assuming the link road does transfer the pressure off Keele Bank, and assuming a significant uptake of the new bus routes to Keele, that the additional burden of these dwellings will reduce the impact to the existing road network as at capacity. I have significant concerns that this ideal scenario will not unfold, and therefore these developments will have significant impact in worsening the current situation. The local plan refers to an integrated transport solution, with little detail as to how this will be implemented. We know that public transport in this part of the borough is heavily reliant on the bus network. I have significant concerns about the efficacy of public transport solutions, reliant on buses, due to the significant traffic pressures seen under current levels of dwellings. The introduction of 1650 dwellings will further increase the pressure, impacting on bus journey times and making the only public transport system less attractive.

The cascade impact of these dwelling will be felt most acutely in the village of the Silverdale. With pressures on traffic exiting these developments via Keele Bank, most traffic will redirect through Silverdale village. The existing road network in Silverdale struggles with the pressure of continued development, and no improvements to the road network. The roads that link the northern segment of Silverdale village with the proposed developments on Keele Golf course are not designed for heavy traffic use. The undulated nature of the road network, coupled with on street parking will become a pressured rat run during peak commuting hours, place undue pressure on the residents of Silverdale. I am disappointed that a plan proposing to build a significant concentration of dwellings has not put forward a plan for improvement to the highway network. The lack of a tangible plan to mitigate these impacts, along with over-reliance on 106 funding to support transport improvements is a significant weakness that needs addressing before permission can be granted for these sites. The pressure on GP provision has not been appropriately assessed in this plan. The area benefits from two GP surgeries, one in Silverdale and one on the Keele University campus. I am led to believe that the new surgery proposed for the Golf Course developments will be a relocation of the Keele campus surgery, and therefore not additional provision. I have concerns that under the proposed developments, residents will struggle with provision of GP coverage. Further general concerns on the local plan are covered in the opposition group response. I would also draw the inspectors attention to the formal response submitted by Keele and Silverdale Parish Councils, Cllr Jacqueline Brown, and Save our Green Spaces (SoGS).

<b>Comment ID</b>	NULLP1496
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q6 Details</b>	<p><b>Introduction</b></p> <p>The Labour group on Newcastle-under-Lyme Borough council represents the authority's principal opposition group. The group comprises of 18 of the 44 total council members on the authority. Throughout the local plan process, the Labour group has scrutinised the plan, when afforded opportunity to do so, during scrutiny committee, planning committee and full council. Though several recommendations have been proposed, these have not been taken into account by the administration, and therefore the final version of the plan (at Regulation 19 stage) has not taken account of opposition suggestions. This response outlines several concerns that we feel critical to the success of the plan, and pertinent to the planning inspector during official examination of the plan.</p> <p><b>Overview</b></p> <p>The Labour group acknowledges the significant amount of work put into preparation of the regulation 19 pre-submission draft local plan. The Labour group acknowledges the need for a functional and sustainable local plan to ensure development within the borough is guided towards areas of unmet need, or suitability. We wish to be clear that there are many areas of the proposed plan that we agree with and support. However, there are areas of the plan where we have concerns. Whilst these concerns make up most of our comments, they are presented with due respect to several areas of the plan where we agree. We are committed to getting good value for money on behalf of our residents and delivering economic growth, but also protecting green spaces. Therefore, we are unable to support the plan in its current form, where the plans aspirations are unlikely to be matched by realised commitments. Our specific concerns, and proposals to help alleviate these are as follows:</p> <p><b>Housing Targets</b></p> <p>During Regulation 18 examination of the local plan the Labour group raised concerns over the adoption of a housing target of a minimum of 8,000 dwellings from 2020-40 equating to 400 dwellings per annum. Our objections to this housing target were based on a national minimum housing target calculation of 330 p.a. We further note that the housing and economic needs assessment commissioned by the council models a housing need of 347 p.a.1. In providing evidence for the adopted housing target of 400 dwellings p.a. the council relies on modelling provided by the housing and economic needs assessment update that suggests a forecast job creation of at mid-point between modelling forecasts 207 p.a.1, with a blended approach suggesting 237 p.a.</p>



The Labour group notes the concern raised over available modelling data in the Turley Report:

*"These are though becoming dated, with each provider having released new forecasts in the last year which envisage the creation of between 194 and 364 new jobs per annum between 2023 and 2040. Either would represent an improvement on the past trend, with Newcastle-under-Lyme having created only 20 jobs per annum on average since 2009, but the higher forecast – from Cambridge Econometrics – appears particularly optimistic given that it adds 100 jobs per year to its previous forecast, presented in the HENAU. This appears due to an unexplained upgrading of the growth prospects of three sectors that have not actually created any jobs in Newcastle-under-Lyme over the past five years, suggesting a need for caution before assuming that these sectors will indeed create far more jobs than forecast only a year ago."*

Turley (March 2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme

Based on these job growth forecasts, the report recommends a housing need of 400 dwellings p.a. The Labour group notes that the Regulation 19 Draft Plan identifies a housing need of 400 dwellings p.a. Consistent with this assumed significant growth forecast in jobs p.a., whilst noting that such housing numbers would be dependant on a 1085% increase in job creation p.a. The Labour group has significant concerns that the level of house building will not match job growth, and thus raises objection to the sustainability of these developments.

### **Delivering Affordable and Social Housing**

The Regulation 19 Draft Plan does not set specific targets for delivery of affordable or social housing. With no clear target on delivery, the Labour group has significant concerns that over the lifetime of the plan limited development of these much-needed dwellings will occur.

The Turley report identifies a calculated need of 278 affordable homes p.a. Whilst challenged on this number, the report does highlight the growing demand on the housing register but assumes that this growth will be met through rising earnings and private sector offerings. The Labour group challenges this assertion, given that wage growth has vastly tracked behind house price, and average rental costs, growth; and that mortgage affordability has been impacted by a significant rise in the Bank of England base rates. The Labour group has concerns that such assumptions will lead to an under-delivery of affordable homes.

The Regulation 19 Draft Plan recommends a number of policies for delivery of affordable and social housing. These are formed under Policy HOU1 Affordable Housing and include:

*"On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:*

- a. 30% of all units on greenfield sites.*
- b. 15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.*
- c. 25% of units on brownfield sites within the 'high value zone' as shown on the policies map."*

*"Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time"*

Unfortunately, at the time of writing we have not been able to locate within the Policies Map document any reference to distribution of sites across 'low vale' and 'high value' zones. However, on the assumption that delivery across non-greenfield sites will amount to 20% of dwellings in developments of 10 dwellings or more, or 0.5ha in size. On this assumption of the 400 dwellings-built p.a, only 80 p.a will be affordable or social housing. This is dramatically below the number of affordable of social rent dwellings needed. Whilst the plan mentions delivering affordable housing, the Labour Group finds no tangible commitments that provide reassurance of its delivery. Current housing policy has largely failed to produce affordable housing due to systemic issues affecting supply, demand, and financing. The introduction of 'Right to Buy' has seen local authorities struggle to replace housing stock, while lengthy approval processes, excessive regulations, and permitting delays have hindered new builds. Rising construction costs, driven by increased material prices, labour shortages, and supply chain issues, have pushed developers towards high-end housing. Limited government support, insufficient subsidies, and poorly targeted incentives have compounded the problem, with the previous government (2010-2024) failing to allocate adequate funding or attract developers. Housing is increasingly treated as an investment asset, with speculative bubbles inflating prices and reducing affordability. Ineffective policies, such as underfunded public housing and rent controls, exacerbate these challenges. In areas like Newcastle-under-Lyme and wider North Staffordshire, wages lag behind housing costs, leading to an affordability gap. Existing rental assistance schemes are often inadequate, failing to cover the full rent cost, and there is a failure to address the needs of the homeless and vulnerable populations, leaving affordable housing out of reach for those who need it most.

The Labour group believes the policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a. That whilst the commitment to secure between 15-30% of dwellings as affordable homes is a good first step. To meet the demand required, the policy would need to see 70% of new developments as affordable or socially rented. Whilst the Labour group accepts that this percentage would potentially deter developers, we have significant concern that the current 15-30% range will not be met. Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough. The Labour group proposes a recommendation to improve the deliverability of affordable and social housing.

### **Labour group proposal**

That for developments on public owned land, the minimum percentage of dwellings allocated for affordable and social rented homes is increased to 50%. Given that several large housing developments will occur on either Borough or County Council owned land, and increased allocation in these areas, where land purchase is not necessary will address significant shortfall between anticipated built and need.



Further, whilst outside of the material considerations for the local plan, the Labour group proposes that the Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient.

The Council generally works with housing developers and other stakeholders to facilitate affordable housing projects – but these have not and will not meet the demand or provide the foundations required for the next twenty years. The argument for our council returning to build council houses revolves around several key points, emphasising the need for more affordable housing, the limitations of private market solutions, and the role of public investment in addressing the housing crisis.

If council builds and retains its housing stock, we create long-term assets that generate rental income and remain under public control. This is a sustainable approach to housing provision, as opposed to relying solely on private developers who may prioritise short-term profit over community needs.

Our proposal to return to council housebuilding is seen by our group as a crucial solution to the affordable housing crisis. By taking control of housing supply, council can directly address the needs of vulnerable residents, provide stability, and counter the failures of market-driven housing policies. Investing in council housing is also a long-term, sustainable approach that can contribute to the overall health and well-being of communities within the Borough.

### Transport

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

Bus services connect the main towns in Staffordshire & Stoke-on-Trent and provide cross boundary links with neighbouring authorities and towns. Whilst bus services have declined in recent years, they continue to provide vital connections between people, services and places of work and enable people to make more sustainable travel choices.

Staffordshire & Stoke-on-Trent's bus network is operated by several private operators including Arriva Midlands, First Potteries (operating 70% of services in Stoke-on-Trent), D & G, and National Express West Midlands who are significantly increasing their presence in the county. Diamond Bus, Stagecoach and Select Buses also operate services on selected routes.

Key public transport issues include congestion and unreliable journey times, limited frequency of services and falling bus patronage levels affecting commercial viability. To reduce per capita road transport emissions, Staffordshire County Council wish to improve walking, cycling and bus facilities, and are promoting their use to encourage a modal shift away from car use.

Rail connectivity in Staffordshire is currently delivered through a comprehensive rail network and several different franchises. The West Coast Main Line is 700 miles in length from London Euston to Glasgow via Birmingham providing fast services from several Staffordshire stations to London. It is one of the busiest freight routes in Europe and part of the Trans-European Transport Network (TEN-T) route, carrying 40% of all UK rail freight traffic. There are at least 14 train operator companies using this line. Cross Country operate services from the South Coast, Reading, and Birmingham to Manchester calling at Stafford and Stoke-on-Trent. The Crewe to Derby Line which runs via Stoke-on-Trent and Uttoxeter currently suffers from overcrowding.

The local plan makes no proposals to address these issues other than a reference to:

*High Speed Two (HS2) services will pass through Staffordshire when Phase 1 is operational. HS2 services will stop at Stafford Station and will improve journey times and connectivity to London and Birmingham. Phase 2b will provide further improvements in journey times and capacity from Stafford to London, Birmingham and the North West, while 27 releasing capacity on West Coast Main Line services for other Staffordshire & Stoke-on Trent stations."*

Since the publication of the draft plan the HS2 project has been scrapped by the previous Conservative government.

*"The need for a link between the M54 and the M6 was identified in the 2014 Road Investment Strategy (RIS) to relieve congestion on the A460, A449 and A5. The preferred option was announced in 2018 (and a planning application submitted in 2020) which includes a dual carriageway link between M54 J1 and M6 J11 and associated improvements. 6.9. The Midlands Connect studies for the A50 / A500 and A5 have already begun to consider how congestion issues can be addressed and growth supported along these key corridors. The case for investment and opportunities to deliver transport interventions to accelerate growth in the region are being explored. This will lead to preferred investment priorities along these routes which will likely need to be delivered to fully realise the growth potential of Staffordshire & Stoke-on-Trent."*

No further announcements on this road infrastructure have been announced.

Critically however, there is no mention of improved transport links to the Town centre or the Royal Stoke Hospital or the new planned Integrated Care Hub at Bradwell or a plan to improve connection to the rural areas of the borough.

As part of the evidence base for the local plan the Council commissioned a Strategic Transport Assessment by Sweco UK Limited. The SWECO report outlines the existing pressures on the highways network throughout the borough, including the following locations:

- *Slow moving traffic observed in and around Newcastle-under-Lyme centre,*
- *Some limited speed reductions in southern areas of Newcastle-under-Lyme Borough, Madeley and Audley,*
- *Slow moving traffic on the A34 Newcastle Road from the A500 to north of Clough Hall Drive though largely no queuing. Some traffic congestion on signalised roundabout"*

SWECO (July 2024) Strategic Transport Assessment

The draft local plan makes no reference to these existing pressures, nor does it provide any solutions to these pressures.

The SWECO report also notes the existing pressures on links to the strategic road network, notably the M6 and A500.

- M16 J16 - Observed data shows traffic congestion along the A500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM)
- M6 J15 - The speed data indicates that queued traffic (speed 1-10mph) is observed along the A500 approach to the A500 Queensway\ Newcastle Road roundabout in the PM peak,
- A500\Alsager Road – Can be inferred from data to be operating without any capacity related congestion,
- Talke Interchange - Some relatively slow-moving traffic, along the section between the Newcastle Road\Talke Road roundabout. However, the data indicates that this is slow moving traffic, but in general the data does not show any large reductions in speed due to queuing,
- A500/A527 - Data indicates that traffic is operating without the presence of queues long term queues during the peak hour,
- A500/A34 -In the AM peak observed speeds of around 20-30mph are in line with the speed limits in place on the A34. This is with the exception of the A34 northbound approach to the gyratory which shows lower observed speeds of around 10-20mph. In the PM peak lower speeds of 10-20mph are also observed on the southbound approach to the gyratory.”

SWECO (July 2024) Strategic Transport Assessment

Again, there are no proposals within the local plan to address these existing pressures on connectivity to the wider strategic road network.

The SWECO report modelled the impact of housing and strategic site developments on traffic flow and made the following conclusions.

Keele:

*“It can be seen that there is a further worsening from the core-only scenario with now severe congestion forecast in both directions of Keele Road between the University and Gallowstree Lane roundabout. Evidence of re-routing is seen with increases in V/C forecast for Mill Street in Silverdale. Moderate junction delay issues begin to become apparent at the signalised junction of Cemetery Road/Church Lane/B5044. These patterns are also visible in the difference plots (Figure 8-15 and Figure 8-16) where volume has increased around the B5044 (Silverdale), A525 (Keele Road) and A53. It should be noted that the NSMM model is developed within the CUBE modelling software application. A limitation of the CUBE software is that it does not model blocking back (traffic queuing back to previous road links with potential to impact other links and junctions). Therefore, there is the possibility of additional related impacts to queuing traffic on Keele Road, for example to the Keele University roundabout.”*

SWECO (July 2024) Strategic Transport Assessment

The report recommends mitigations at Keele:

*“A new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525.*

*A new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road.”*

*The report notes the impact of these mitigation measures:*

*For Keele, the mitigation measure of a new link road added between the University and Whitmore Road is seen to have a positive impact on the reduction of traffic on Keele Road between the University Roundabout and Gallowstree Lane.*

*It can be seen that during the AM period, westbound traffic is most improved whilst in the PM period, eastbound traffic is most improved. This is likely to be of significant improvement for University traffic and related bus services.*

*It can also be seen that the mitigation brings volume back or nearly back to capacity for each direction and period. There is potential for additional improvements to be made with high impact travel plans and other local bus service improvements.”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes that this report only mitigates the impact of the proposed developments, and in doing so “brings volume back or nearly back to capacity for each direction and period”. The Labour group has significant concerns that the mitigation measures proposed in the report are not sufficient to provide long-term sustainable traffic flow in the area.

The report recommends the following mitigations at Audley:

*“Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour.”*

SWECO (July 2024) Strategic Transport Assessment

The report recommends the following mitigation measures in Talke:

*“Extension of the NW-bound Newcastle Road two-lane approach to the signalised junction at Newcastle Road/Coalpit Hill. This will give additional space for right-turning traffic that is leading to junction delay issues in scenario 2 – core local plan sites.*

*Cedar Avenue – Community improvements to Cedar Avenue to increase attractiveness of walking, wheeling, and cycling (not able to model in the strategic NSMM transport model).”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes the Local plan has identified mitigation measures at Keele and Talke:

*“13. Transport infrastructure identified through the Strategic Transport Assessment will be supported.*

*This is to include: - a. a link road between A525 Keele Road and Whitmore Road. b. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)”*

SWECO (July 2024) Strategic Transport Assessment

Labour group notes that funding for these mitigation measures will be identified via 106 funding levied on developments in the area. The Labour group has significant concerns that mitigating the impact of these developments will require 106 funding, and that given the impact of rising cost of living, several developments have proceeded following waiver of the 106 funding requirements. We note within the councils own Infrastructure Baseline Report the following:

*“At the same time, it is critical that any infrastructure expectations do not disincentivise development to such an extent that it becomes unviable, thus inhibiting Newcastle-under-Lyme’s growth opportunities. This challenge is particularly acute in those parts of Newcastle-under-Lyme where land and property values are low and profit margins on development are small or even non-existent. In some parts of the Borough, the private sector will not be able to meet all of the infrastructure/policy requirements which are ultimately set out in the Local Plan. In such cases, an appropriate balance will need to be struck between competing interests and demands.”*

NBC (July 2024) Infrastructure Baseline Report

The Labour group also notes the Strategic Transport Assessment provided by the SWECO report does not include assessment of the impact of public transport, outside of assumed reductions in car usage. The borough of Newcastle-under-Lyme, like many other post-industrial non-metropolitan districts, can be considered as a deprived public transport area. Within the borough, public transport is provided via the bus network, and thus subject to the impact of increased traffic and lack of mitigation. At present, travel from Newcastle to connecting rail network stations at Stoke is a 40-minute bus journey outside of periods of high traffic congestion, with a 1 hour journey to Crewe. The Labour group has concerns that the local plan, whilst referring to increased walking and cycling, has no reference to improving the outdated, inefficient, and poor provision of existing public transport across the borough.

#### **Labour group proposal**

The Labour group wants to see the local plan have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of our communities. That such integrated transport plan involves the combining of different modes of transport to maximise ease and efficiency for the user in terms of time, cost, comfort, safety, accessibility and convenience. We are aware that the cuts to bus routes and times across the borough are leading to difficulties in accessing employment, education and health services. We also know that lack of connectivity leads to social isolation.

The Labour group expects to see how the borough plans to address the needs of residents within the borough, demonstrate how it supports the proposed growth in development and population in the plan by working with bus operators, planners and other local authorities such as Staffordshire County Council and Stoke on Trent City Council to get Newcastle moving and growing.

#### **Education**

The Borough of Newcastle is divided into two distinct areas for the purpose of school place planning: 1) Newcastle and 2) Kidsgrove. These areas are further broken down into smaller planning areas, which are used to determine the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools and by analysing pupil movement between schools and catchment areas.

A two-tier education system, consisting of Primary (ages 4-11) and Secondary (ages 11-16/18) schools, operates across the Borough. Sixth form provision is available on-site at two secondary schools within the district and is mainly accessible at Newcastle College, with The King’s Church of England School, Kidsgrove, also providing this provision. As of September 2020, Newcastle has 30 primary schools, 1 infant school, 1 junior school, and 7 secondary schools, while Kidsgrove has 9 primary schools and 2 secondary schools.

The Infrastructure Baseline Report provided by the Council within the local plan evidence base identifies most areas of the borough have existing capacity within local primary schools to satisfy the proposed developments within the local plan. It is noted however that Newcastle region 5 covering the villages of Silverdale and Knutton would have insufficient school places for the proposed developments on the former municipal golf course.

In the infrastructure delivery plan, the local plan proposes the development of a new primary school on the former municipal golf course:

“The relatively large amount of development set out in the plan for the Keele University corridor (with the inclusion of development site SP11) means there is an identified need for a new 1 Form of Entry (FE) primary school.”

Infrastructure delivery plan

The Labour group notes that the infrastructure baseline report does not include St John’s primary school in Keele in meeting the numbers required by this development. Evidence from the school demonstrates the high number of pupils registered at the school from the villages of Silverdale and Knutton. Further, concerns have been raised by members of the governing bodies of the four existing catchment primary schools; St Johns Keele, St Luke’s Silverdale, The Racecourse Silverdale and St Mary’s Knutton regarding the impact of a new primary school on pupil numbers. More alarmingly, neither Staffordshire County Council, nor the Borough council have communicated with the existing primary schools, including discussions over expansion. The Labour group notes that the Borough council has held conversations with St Chads Kidsgrove, Sir John Offley Madeley and Baldwins Gate primary schools over expansions to their existing estate to sustain development, and therefore raises concerns over the unequitable approach to the schools in the Keele, Knutton and Silverdale area.

#### **Labour group proposal**

The Labour group proposes that the prior to adoption of the local plan, that the Council undertakes a consultation with existing primary schools in the Keele, Knutton and Silverdale area to determine if existing capacity can be increased through expansion of the existing estate.

#### **Health & Social Care**

Health services in England are overseen by NHS England, which operates five regional teams to commission healthcare services. NHS Midlands and East support the commissioning of services in the West Midlands in partnership with Clinical Commissioning Groups (CCGs) and Acute Trusts.

Clinical Commissioning Groups, established by the Health and Social Care Act 2012, changed how primary care services are planned. They commission most NHS hospital and community services, including hospital care, rehabilitative care, urgent care, community health services, and mental health and learning disability services.

The six Clinical Commissioning Groups serving Staffordshire and Stoke-on-Trent are:

- Cannock Chase CCG

- East Staffordshire CCG
- North Staffordshire CCG
- South East Staffordshire and Seisdon Peninsula CCG
- Stafford and Surrounds CCG
- Stoke-on-Trent CCG

The focus for health and social care is on prevention and providing care outside hospitals where possible. 'Together We're Better' is the Sustainability and Transformation Partnership (STP) for Staffordshire and Stoke-on-Trent. The Staffordshire and Stoke Sustainability Transformation Plan (2016) identifies key challenges, including:

- High rates of obesity, diabetes, and smoking in certain areas.
- An ageing and growing population driving up demand.
- Frequent A&E attendance and a risk-averse staff culture.
- A notable proportion of patients with common mental health conditions.
- Higher than average urgent care activity at acute trusts due to poor primary and community infrastructure and citizen behaviours.

In January 2019, NHS England published The NHS Long Term Plan (LTP) and the Five-Year Framework for GP contract reform, setting out ambitions for the next ten years to improve patient care, health outcomes, and to deliver more coordinated primary and community care. The Five-Year Framework introduced Primary Care Networks (PCNs) as the foundation of Integrated Care Systems (ICSs). Now established, PCNs are groups of one or more GP practices serving populations of 30,000 to 50,000 patients, providing a strategic view of primary care delivery and identifying estate requirements. ICSs, set to replace STPs in April 2021, will offer strategic oversight at the regional level, identifying opportunities for integrated working across health and social care partners. By April 2022, ICSs will become statutory bodies.

The infrastructure delivery plan notes the following:

"There are three Primary Care Networks (PCNs) in Newcastle-under-Lyme (Newcastle North, Newcastle Central and Newcastle South PCNs) that serve the residents of Newcastle-under-Lyme. These comprise 17 general practices. Of the practices in Newcastle-under-Lyme, only Silverdale Medical Centre is reported to have surplus capacity to accommodate patients with all other practices reporting insufficient capacity. In summation, there are capacity issues at many locations in Newcastle-under-Lyme with some of this attributed to the level of growth experienced by the borough in recent years and a historic lack of funding for the estate via mechanisms such as the planning system"

Infrastructure delivery plan

The Labour group notes all GP practices, outside of the practice in Silverdale, which must be noted is twinned with the Town Centre practice at Ryecroft, are currently at patient capacity. The Labour group further notes that the only proposal within the Local plan is for a new GP practice on the former Golf course, though we also note that this is a relocation of an existing local practice.

### **Social care**

The Department of Health and Social Care oversees adult social care policy in England, with the Care Quality Commission acting as the independent regulator to ensure care services are safe, effective, compassionate, and high-quality.

In England, adult social care can be publicly or privately funded or provided voluntarily. Local authorities are responsible for publicly funded care and have a legal duty to provide care for those who meet nationally set needs and means tests, either by commissioning or directly delivering services.

Pressures on adult social care budgets have risen in recent years due to increasing demand (from a growing, ageing population with more long-term and multiple health conditions), reduced local government funding, and higher care costs.

Consequently, the adult social care sector is facing growing challenges, including a fragile provider market, increasing unmet needs, more strain on informal carers, reduced investment in prevention, pressure on an already overstretched care workforce, and a diminished capacity to help ease demand on the NHS.

In the infrastructure baseline report the following is noted:

"It should be noted that local demand for care services will vary based on the overall size of the population and specific population care needs, the affordability, quality and location of existing services. This is covered in more detail within Staffordshire County Council's market position statements and associated intelligence documents. Newcastle-under-Lyme currently has significant provision for extra care facilities, residential care homes & nursing homes, but it is anticipated that during the Local Plan period additional units within each of these sectors will be required."

Infrastructure baseline report

The Labour group notes that requirement of additional adult social care facilities during the local plan period. The Labour group further notes the lack of identified development within the local plan to meet the rising demands for adult social care.

### **Labour group proposals**

The Labour group proposes that before adoption of the local plan:

- The Council work with Staffordshire County Council to identify suitable portions of developments sites within the local plan to meet the rising demand for adult social care provision.
- The council work with Primary care networks to increase GP capacity across the whole of the borough.

### **Strategic Employment Sites – the case against AB2 and the case for Chatterley Valley**

The Labour group is opposed to the proposals for the AB2 employment site in Audley. Taking 80 hectares of land in the rural village of Audley out of the green belt and designating it as high-quality strategic employment site without the evidence base to do so and considering the significant recorded public opposition to the proposal appears to be flawed. The removal of green belt, the increase in traffic, noise and pollution combined with the lack of adequate local infrastructure across the locality is inappropriate, especially so when we already have Chatterley Valley strategic employment site that barely features in the Local Plan at all.



This is quite incredible considering Chatterley Valley has seen £3.5 Million investment from Staffordshire County Council into the site, alongside the £3.7 Million the borough council secured as part of the Kidsgrove Town Deal, and has seen infrastructure, utilities and access upgraded. The Labour group further notes that under the duty to co-operate the Council did not approach Stoke-on-Trent Council, or Staffordshire County Council overuse of the Chatterley Valley development site in the local plan to meet the need for strategic employment sites. The Labour group is concerned that in the doing so, the Council has not legally satisfied the test within the Localism Act and therefore questions the proposal to meet the need for strategic employment sites through removal of land from the green belt.

#### **Labour group proposals**

Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.

Chatterley Valley is positioned near key transport links, making it ideal for a strategic enterprise zone. It lies close to the M6 motorway, the A500 (a key artery linking Stoke-on-Trent and Crewe), and major rail links, offering excellent access to the Northwest, the Midlands, and beyond. This location provides businesses with opportunities to easily transport goods and services across the UK, potentially reducing logistics costs and improving connectivity. The North Staffordshire region, including Newcastle-under-Lyme, has a long industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services. The creation of a strategic enterprise zone in Chatterley Valley would capitalize on this local expertise, attracting investment and providing job opportunities for the region.

#### **Brownfield Redevelopment Potential**

Chatterley Valley has a significant amount of underutilized and brownfield land, which presents a perfect opportunity for redevelopment without impacting greenfield sites. Developing this area would contribute to urban regeneration, transforming it into a hub for industries like green technology, logistics, or advanced manufacturing. Redeveloping brownfield sites aligns with sustainable development goals, boosting the region's environmental credentials.

#### **Potential for Attracting Investment**

Enterprise zones offer businesses tax incentives, simplified planning, and infrastructure support, all of which would make Chatterley Valley an attractive destination for both national and international investors. By designating it a strategic enterprise zone, the area could attract new companies and startups, as well as encourage the growth of existing businesses. This could significantly boost the local economy, creating jobs and increasing regional prosperity.

Locally, this would support Newcastle-under-Lyme Borough Council's economic plans, which focus on regeneration and business growth. The Labour Group want to see a borough strategy aimed at stimulating economic growth in the Midlands and the North to reduce regional disparities. Chatterley Valley could serve as a platform for innovation and the digital economy. With the rise of Industry 4.0, the area has potential to become a centre for businesses involved in automation, artificial intelligence, and digital services. The location could also foster collaboration with nearby Keele and North Staffordshire Universities, known for its research and innovation. Such collaborations could encourage knowledge transfer and innovation-led business growth.

#### **Sustainability and Green Energy Opportunities**

Given the global focus on sustainability and green energy, Chatterley Valley offers an opportunity for eco-friendly development. The site could house businesses focused on renewable energy, energy-efficient technologies, and sustainability initiatives. This would not only contribute to the Councils net-zero goals but also attract companies prioritising sustainable operations, helping to future-proof the local economy.

#### **Adherence to genuine consultation and due process**

The Council is well aware of the large number of complaints and concerns raised at the first consultation stage of the draft plan (1st November 2021 - 13th December 2021), these were largely but not confined to, complaints around lack of face-to-face briefings, forms not being made available as stated, and technical issues and failures of the on line portal. It was clear at that time that the consultation was targeted at highly competent, computer literate regular laptop users, who could cross reference up to 200 public documents through the portal avenue to answer 37 planning specific questions. The readability of the document was poor and out of line with good practise.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100807/file47158.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf),

Labour Councillors raised concerns that the consultation was too focused on the on-line portal and digital access, which we believed would lead to exclusion for thousands of elderly residents, as well as those who did not or could not afford their own laptops, tablets or computers. We felt this approach was contrary to the community engagement and digital exclusion policies previously agreed by the Council.

The Labour welcomed the fact that these issues were focussed on in the second stage consultation and in the main remedied.

However, the Labour group raised a serious issue at a meeting of full council on 24-07-24, where Council was to approve that the plan be agreed and put forward to regulation 19 stage, that critical evidence based documents were still not available to members of council or the public.

The motion highlighting this failure is attached here:

#### **Labour Group Amendments to the Report Titled; Newcastle-under-Lyme Borough Local Plan 2040 of the 24-07-24**

##### **Background**

The Newcastle Labour group of councillors met on Monday 22nd July to review the agenda for the meeting of full council taking place on 24-07-24. The agenda contained at item 5 - Newcastle-under-Lyme Borough Local Plan 2024. The item contains the paper which asks members and council to approve four recommendations as follows;

*That Council:*

- 1. Approves the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme;*
- 2. Authorises the Service Director (Planning), in consultation with the Strategic Planning Portfolio Holder to make any necessary minor typographical changes and modifications to the Final Draft Newcastle-under-Lyme Borough Local Plan 2040, Sustainability Appraisal and Habitat Regulations Assessment prior to consultation;*
- 3. Subject to the outcome of consultation, and if no matters are raised that materially impact upon the Plan strategy, authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024;*
- 4. Authorises the Service Director (Planning) to write to the appointed Inspector(s) at the start of the examination of the Final Draft Newcastle under-Lyme Borough Local Plan 2040 requesting them, under section 20(7C) of the Planning and Compulsory Purchase Act 2004, to recommend any main modifications necessary to ensure the Plan sound and legally compliant.*

#### **Issues identified**

##### **In relation to recommendation 1**

When the Labour group met on the 22-07-24, some 48 hours before the meeting to consider the recommendations we observed that the following supporting documents (none exhaustive) were not available;

1. Infrastructure Delivery Plan
2. Infrastructure Delivery Schedule
3. Strategic Housing and Employment land availability assessment 2024
4. Site assessments
5. Green Belt Assessment
6. Strategic transport assessment
7. Water cycle study
8. Gypsy and traveller site selection report
9. Duty to co-operate statement of compliance
10. Housing supply and delivery position statement

Clearly, the expectation that members approve a local plan through to the regulation 19 representation period, which is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination, is unreasonable and does not adhere to sound governance of the council.

This is a formal process that requires comments on the soundness and legal compliance of the plan.

Members wish to be in a fully informed position in order to move the plan through its statutory process.

##### **In relation to recommendation 3**

Consultation is technically any activity that gives people a voice, in this context it is an exercise to provide local residents, businesses and stakeholders a voice and an opportunity to influence important decisions relating to the Borough's local plan.

Consultation requires listening to local people and learning from affected people before decisions are made or priorities are set.

Councils have a statutory requirement to consult their residents, this is especially true for planning or redevelopments. There are strict rules surrounding how consultations are conducted, and a failure to adhere to this could render the council liable for a judicial review.

It is in this regard that recommendation 3 is manifestly problematic – to agree to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024, without affording council the time and space to review the consultation, in full, and to take account of residents, business and stakeholders views in our plan before submitting to the Secretary of State, does not accord with the fundamental principles of consultation compliance. A failure to demonstrate that council has undertaken meaningful consultation could leave council open to complaints of pre-determination.

The most common failures of local authority plans are due to inconsistencies with National Planning Policy, lack of evidence base and inadequate engagement. The amendments below seek to remedy any possible flaws in the plan and process. It is our view that a failure to do so would open the authority to the risk of litigation, reputational damage, and a loss of trust and confidence by those engaging with the process.

#### **Proposed amendments**

Replace recommendation(s) 1 and 3 with the following;

1. Council agrees to bring the final draft plan, and supporting documents to the September 2024 full council meeting seeking councils approval of the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme.
3. Following completion of the consultation, council will meet to receive and consider the responses. If council agrees that no amendments to the plan are required and no matters are raised that materially impact upon the Plan strategy, council authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination at the earliest opportunity.

ENDS

#### **Amendment Proposer**

Cllr Dave Jones

#### **Amendment Seconder**

Cllr Andrew Fox-Hewitt

In response to this motion highlighting critical failures of due process, the Conservative group voted to dismiss the recommendations and voted to proceed to approve the plan through to regulation 19 stage.



	<p>The Leader of the Council, Cllr Simon Tagg stated at this meeting that it was not true that documents were unavailable prior to group meetings on the 22nd July, Subsequently to the council meeting however, a complaint and request under the Freedom of Information Act was made to provide details of when documents were made available. The Council response is here; (Table available in attachment)</p> <p>As can be seen from the response, a total of 9 documents were in fact unavailable. The Labour Group therefore has serious concerns with the adherence to due process the probity of the Leaders actions in response to these issues being identified.</p> <p><b>Conclusion</b></p> <p>In summary whilst there is much within the Local Plan the Labour group can support, there are several weaknesses that we feel need to be addressed before the Local Plan can be adopted. These include:</p> <p>I. Clear targets and delivery plan to ensure the ever-increasing demand for affordable and social housing is met over the lifetime of this Local plan.</p> <p>II. Development of an integrated transport plan, including costings and delivery plan that is not subject solely to 106 contributions.</p> <p>III. Work with existing primary schools in Knutton, Silverdale and Keele to explore potential expansion of their existing estate to increase pupil capacity.</p> <p>IV. Work with Staffordshire County Council to identify capacity within proposed developments for provision of adult social care facilities.</p> <p>V. Work with Primary Care Networks to identify mechanisms to increase GP capacity across the borough.</p> <p>VI. Work with Staffordshire County Council and Stoke-on-Trent City Council to identify capacity within the Chatterley Valley site to accommodate the need for employment sites.</p> <p>Further, the failure to co-operate on sharing of a major strategic employment site at Chatterley Valley, and concerns raised over the consultation process and availability of essential documents; further questions the plans compliance with the Localism Act.</p>
<b>Q10 File 1</b>	6392590
<b>Attachments</b>	<a href="#">1364354 Cllr David Jones.pdf</a>
<b>Comment ID</b>	NULLP1501
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>Introduction</b></p> <p>The Labour group on Newcastle-under-Lyme Borough council represents the authority's principal opposition group. The group comprises of 18 of the 44 total council members on the authority. Throughout the local plan process, the Labour group has scrutinised the plan, when afforded opportunity to do so, during scrutiny committee, planning committee and full council. Though several recommendations have been proposed, these have not been taken into account by the administration, and therefore the final version of the plan (at Regulation 19 stage) has not taken account of opposition suggestions. This response outlines several concerns that we feel critical to the success of the plan, and pertinent to the planning inspector during official examination of the plan.</p> <p><b>Overview</b></p> <p>The Labour group acknowledges the significant amount of work put into preparation of the regulation 19 pre-submission draft local plan. The Labour group acknowledges the need for a functional and sustainable local plan to ensure development within the borough is guided towards areas of unmet need, or suitability. We wish to be clear that there are many areas of the proposed plan that we agree with and support. However, there are areas of the plan where we have concerns. Whilst these concerns make up most of our comments, they are presented with due respect to several areas of the plan where we agree. We are committed to getting good value for money on behalf of our residents and delivering economic growth, but also protecting green spaces. Therefore, we are unable to support the plan in its current form, where the plans aspirations are unlikely to be matched by realised commitments. Our specific concerns, and proposals to help alleviate these are as follows:</p> <p><b>Housing Targets</b></p> <p>During Regulation 18 examination of the local plan the Labour group raised concerns over the adoption of a housing target of a minimum of 8,000 dwellings from 2020-40 equating to 400 dwellings per annum. Our objections to this housing target were based on a national minimum housing target calculation of 330 p.a. We further note that the housing and economic needs assessment commissioned by the council models a housing need of 347 p.a.1. In providing evidence for the adopted housing target of 400 dwellings p.a. the council relies on modelling provided by the housing and economic needs assessment update that suggests a forecast job creation of at mid-point between modelling forecasts 207 p.a.1, with a blended approach suggesting 237 p.a.</p> <p>The Labour group notes the concern raised over available modelling data in the Turley Report:</p> <p><i>"These are though becoming dated, with each provider having released new forecasts in the last year which envisage the creation of between 194 and 364 new jobs per annum between 2023 and 2040. Either would represent an improvement on the past trend, with Newcastle-under-Lyme having created only 20 jobs per annum on average since 2009, but the higher forecast – from Cambridge Econometrics – appears particularly optimistic given that it adds 100 jobs per year to its previous forecast, presented</i></p>

*in the HENAU. This appears due to an unexplained upgrading of the growth prospects of three sectors that have not actually created any jobs in Newcastle-under-Lyme over the past five years, suggesting a need for caution before assuming that these sectors will indeed create far more jobs than forecast only a year ago."*

Turley (March 2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme

Based on these job growth forecasts, the report recommends a housing need of 400 dwellings p.a. The Labour group notes that the Regulation 19 Draft Plan identifies a housing need of 400 dwellings p.a. Consistent with this assumed significant growth forecast in jobs p.a., whilst noting that such housing numbers would be dependant on a 1085% increase in job creation p.a. The Labour group has significant concerns that the level of house building will not match job growth, and thus raises objection to the sustainability of these developments.

### **Delivering Affordable and Social Housing**

The Regulation 19 Draft Plan does not set specific targets for delivery of affordable or social housing. With no clear target on delivery, the Labour group has significant concerns that over the lifetime of the plan limited development of these much-needed dwellings will occur.

The Turley report identifies a calculated need of 278 affordable homes p.a. Whilst challenged on this number, the report does highlight the growing demand on the housing register but assumes that this growth will be met through rising earnings and private sector offerings. The Labour group challenges this assertion, given that wage growth has vastly tracked behind house price, and average rental costs, growth; and that mortgage affordability has been impacted by a significant rise in the Bank of England base rates. The Labour group has concerns that such assumptions will lead to an under-delivery of affordable homes.

The Regulation 19 Draft Plan recommends a number of policies for delivery of affordable and social housing. These are formed under Policy HOU1 Affordable Housing and include:

*"On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:*

*a. 30% of all units on greenfield sites.*

*b. 15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.*

*c. 25% of units on brownfield sites within the 'high value zone' as shown on the policies map."*

*"Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time"*

Unfortunately, at the time of writing we have not been able to locate within the Policies Map document any reference to distribution of sites across 'low vale' and 'high value' zones. However, on the assumption that delivery across non-greenfield sites will amount to 20% of dwellings in developments of 10 dwellings or more, or 0.5ha in size. On this assumption of the 400 dwellings-built p.a. only 80 p.a will be affordable or social housing. This is dramatically below the number of affordable of social rent dwellings needed. Whilst the plan mentions delivering affordable housing, the Labour Group finds no tangible commitments that provide reassurance of its delivery. Current housing policy has largely failed to produce affordable housing due to systemic issues affecting supply, demand, and financing. The introduction of 'Right to Buy' has seen local authorities struggle to replace housing stock, while lengthy approval processes, excessive regulations, and permitting delays have hindered new builds. Rising construction costs, driven by increased material prices, labour shortages, and supply chain issues, have pushed developers towards high-end housing. Limited government support, insufficient subsidies, and poorly targeted incentives have compounded the problem, with the previous government (2010-2024) failing to allocate adequate funding or attract developers. Housing is increasingly treated as an investment asset, with speculative bubbles inflating prices and reducing affordability. Ineffective policies, such as underfunded public housing and rent controls, exacerbate these challenges. In areas like Newcastle-under-Lyme and wider North Staffordshire, wages lag behind housing costs, leading to an affordability gap. Existing rental assistance schemes are often inadequate, failing to cover the full rent cost, and there is a failure to address the needs of the homeless and vulnerable populations, leaving affordable housing out of reach for those who need it most.

The Labour group believes the policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a. That whilst the commitment to secure between 15-30% of dwellings as affordable homes is a good first step. To meet the demand required, the policy would need to see 70% of new developments as affordable or socially rented. Whilst the Labour group accepts that this percentage would potentially deter developers, we have significant concern that the current 15-30% range will not be met. Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough. The Labour group proposes a recommendation to improve the deliverability of affordable and social housing.

### **Labour group proposal**

That for developments on public owned land, the minimum percentage of dwellings allocated for affordable and social rented homes is increased to 50%. Given that several large housing developments will occur on either Borough or County Council owned land, and increased allocation in these areas, where land purchase is not necessary will address significant shortfall between anticipated built and need.

Further, whilst outside of the material considerations for the local plan, the Labour group proposes that the Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient.

The Council generally works with housing developers and other stakeholders to facilitate affordable housing projects – but these have not and will not meet the demand or provide the foundations required for the next twenty years. The argument for our council returning to build council houses revolves around

several key points, emphasising the need for more affordable housing, the limitations of private market solutions, and the role of public investment in addressing the housing crisis.

If council builds and retains its housing stock, we create long-term assets that generate rental income and remain under public control. This is a sustainable approach to housing provision, as opposed to relying solely on private developers who may prioritise short-term profit over community needs. Our proposal to return to council housebuilding is seen by our group as a crucial solution to the affordable housing crisis. By taking control of housing supply, council can directly address the needs of vulnerable residents, provide stability, and counter the failures of market-driven housing policies. Investing in council housing is also a long-term, sustainable approach that can contribute to the overall health and well-being of communities within the Borough.

### Transport

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

Bus services connect the main towns in Staffordshire & Stoke-on-Trent and provide cross boundary links with neighbouring authorities and towns. Whilst bus services have declined in recent years, they continue to provide vital connections between people, services and places of work and enable people to make more sustainable travel choices.

Staffordshire & Stoke-on-Trent's bus network is operated by several private operators including Arriva Midlands, First Potteries (operating 70% of services in Stoke-on-Trent), D & G, and National Express West Midlands who are significantly increasing their presence in the county. Diamond Bus, Stagecoach and Select Buses also operate services on selected routes.

Key public transport issues include congestion and unreliable journey times, limited frequency of services and falling bus patronage levels affecting commercial viability. To reduce per capita road transport emissions, Staffordshire County Council wish to improve walking, cycling and bus facilities, and are promoting their use to encourage a modal shift away from car use.

Rail connectivity in Staffordshire is currently delivered through a comprehensive rail network and several different franchises. The West Coast Main Line is 700 miles in length from London Euston to Glasgow via Birmingham providing fast services from several Staffordshire stations to London. It is one of the busiest freight routes in Europe and part of the Trans-European Transport Network (TEN-T) route, carrying 40% of all UK rail freight traffic. There are at least 14 train operator companies using this line. Cross Country operate services from the South Coast, Reading, and Birmingham to Manchester calling at Stafford and Stoke-on-Trent. The Crewe to Derby Line which runs via Stoke-on-Trent and Uttoxeter currently suffers from overcrowding.

The local plan makes no proposals to address these issues other than a reference to:

*High Speed Two (HS2) services will pass through Staffordshire when Phase 1 is operational. HS2 services will stop at Stafford Station and will improve journey times and connectivity to London and Birmingham. Phase 2b will provide further improvements in journey times and capacity from Stafford to London, Birmingham and the North West, while 27 releasing capacity on West Coast Main Line services for other Staffordshire & Stoke-on Trent stations."*

Since the publication of the draft plan the HS2 project has been scrapped by the previous Conservative government.

*"The need for a link between the M54 and the M6 was identified in the 2014 Road Investment Strategy (RIS) to relieve congestion on the A460, A449 and A5. The preferred option was announced in 2018 (and a planning application submitted in 2020) which includes a dual carriageway link between M54 J1 and M6 J11 and associated improvements. 6.9. The Midlands Connect studies for the A50 / A500 and A5 have already begun to consider how congestion issues can be addressed and growth supported along these key corridors. The case for investment and opportunities to deliver transport interventions to accelerate growth in the region are being explored. This will lead to preferred investment priorities along these routes which will likely need to be delivered to fully realise the growth potential of Staffordshire & Stoke-on-Trent."*

No further announcements on this road infrastructure have been announced.

Critically however, there is no mention of improved transport links to the Town centre or the Royal Stoke Hospital or the new planned Integrated Care Hub at Bradwell or a plan to improve connection to the rural areas of the borough.

As part of the evidence base for the local plan the Council commissioned a Strategic Transport Assessment by Sweco UK Limited. The SWECO report outlines the existing pressures on the highways network throughout the borough, including the following locations:

- *Slow moving traffic observed in and around Newcastle-under-Lyme centre,*
- *Some limited speed reductions in southern areas of Newcastle-under-Lyme Borough, Madeley and Audley,*
- *Slow moving traffic on the A34 Newcastle Road from the A500 to north of Clough Hall Drive though largely no queuing. Some traffic congestion on signalised roundabout"*

SWECO (July 2024) Strategic Transport Assessment

The draft local plan makes no reference to these existing pressures, nor does it provide any solutions to these pressures.

The SWECO report also notes the existing pressures on links to the strategic road network, notably the M6 and A500.

*"• M16 J16 - Observed data shows traffic congestion along the A500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM)*

- *M6 J15 - The speed data indicates that queued traffic (speed 1-10mph) is observed along the A500 approach to the A500 Queensway\ Newcastle Road roundabout in the PM peak,*
- *A500Alsager Road – Can be inferred from data to be operating without any capacity related congestion,*

- *Talke Interchange - Some relatively slow-moving traffic, along the section between the Newcastle Road/Talke Road roundabout. However, the data indicates that this is slow moving traffic, but in general the data does not show any large reductions in speed due to queuing,*
- *A500/A527 - Data indicates that traffic is operating without the presence of queues long term queues during the peak hour,*
- *A500/A34 -In the AM peak observed speeds of around 20-30mph are in line with the speed limits in place on the A34. This is with the exception of the A34 northbound approach to the gyratory which shows lower observed speeds of around 10-20mph. In the PM peak lower speeds of 10-20mph are also observed on the southbound approach to the gyratory."*

SWECO (July 2024) Strategic Transport Assessment

Again, there are no proposals within the local plan to address these existing pressures on connectivity to the wider strategic road network.

The SWECO report modelled the impact of housing and strategic site developments on traffic flow and made the following conclusions.

Keele:

*"It can be seen that there is a further worsening from the core-only scenario with now severe congestion forecast in both directions of Keele Road between the University and Gallowstree Lane roundabout. Evidence of re-routing is seen with increases in V/C forecast for Mill Street in Silverdale. Moderate junction delay issues begin to become apparent at the signalised junction of Cemetery Road/Church Lane/B5044. These patterns are also visible in the difference plots (Figure 8-15 and Figure 8-16) where volume has increased around the B5044 (Silverdale), A525 (Keele Road) and A53. It should be noted that the NSMM model is developed within the CUBE modelling software application. A limitation of the CUBE software is that it does not model blocking back (traffic queuing back to previous road links with potential to impact other links and junctions). Therefore, there is the possibility of additional related impacts to queuing traffic on Keele Road, for example to the Keele University roundabout."*

SWECO (July 2024) Strategic Transport Assessment

The report recommends mitigations at Keele:

*"A new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525.*

*A new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road."*

*The report notes the impact of these mitigation measures:*

*For Keele, the mitigation measure of a new link road added between the University and Whitmore Road is seen to have a positive impact on the reduction of traffic on Keele Road between the University Roundabout and Gallowstree Lane.*

*It can be seen that during the AM period, westbound traffic is most improved whilst in the PM period, eastbound traffic is most improved. This is likely to be of significant improvement for University traffic and related bus services.*

*It can also be seen that the mitigation brings volume back or nearly back to capacity for each direction and period. There is potential for additional improvements to be made with high impact travel plans and other local bus service improvements."*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes that this report only mitigates the impact of the proposed developments, and in doing so "brings volume back or nearly back to capacity for each direction and period". The Labour group has significant concerns that the mitigation measures proposed in the report are not sufficient to provide long-term sustainable traffic flow in the area.

The report recommends the following mitigations at Audley:

*"Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour."*

SWECO (July 2024) Strategic Transport Assessment

The report recommends the following mitigation measures in Talke:

*"Extension of the NW-bound Newcastle Road two-lane approach to the signalised junction at Newcastle Road/Coalpit Hill. This will give additional space for right-turning traffic that is leading to junction delay issues in scenario 2 – core local plan sites.*

*Cedar Avenue – Community improvements to Cedar Avenue to increase attractiveness of walking, wheeling, and cycling (not able to model in the strategic NSMM transport model)."*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes the Local plan has identified mitigation measures at Keele and Talke:

*"13. Transport infrastructure identified through the Strategic Transport Assessment will be supported.*

*This is to include: - a. a link road between A525 Keele Road and Whitmore Road. b. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)"*

SWECO (July 2024) Strategic Transport Assessment

Labour group notes that funding for these mitigation measures will be identified via 106 funding levied on developments in the area. The Labour group has significant concerns that mitigating the impact of these developments will require 106 funding, and that given the impact of rising cost of living, several developments have proceeded following waiver of the 106 funding requirements. We note within the councils own Infrastructure Baseline Report the following:

*"At the same time, it is critical that any infrastructure expectations do not disincentivise development to such an extent that it becomes unviable, thus inhibiting Newcastle-under-Lyme's growth opportunities. This challenge is particularly acute in those parts of Newcastle-under-Lyme where land and property values are low and profit margins on development are small or even non-existent. In some parts of the Borough, the private sector will not be able to meet all of the infrastructure/policy requirements which*



*are ultimately set out in the Local Plan. In such cases, an appropriate balance will need to be struck between competing interests and demands.”*

NBC (July 2024) Infrastructure Baseline Report

The Labour group also notes the Strategic Transport Assessment provided by the SWECO report does not include assessment of the impact of public transport, outside of assumed reductions in car usage. The borough of Newcastle-under-Lyme, like many other post-industrial non-metropolitan districts, can be considered as a deprived public transport area. Within the borough, public transport is provided via the bus network, and thus subject to the impact of increased traffic and lack of mitigation. At present, travel from Newcastle to connecting rail network stations at Stoke is a 40-minute bus journey outside of periods of high traffic congestion, with a 1 hour journey to Crewe. The Labour group has concerns that the local plan, whilst referring to increased walking and cycling, has no reference to improving the outdated, inefficient, and poor provision of existing public transport across the borough.

#### **Labour group proposal**

The Labour group wants to see the local plan have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of our communities. That such integrated transport plan involves the combining of different modes of transport to maximise ease and efficiency for the user in terms of time, cost, comfort, safety, accessibility and convenience. We are aware that the cuts to bus routes and times across the borough are leading to difficulties in accessing employment, education and health services. We also know that lack of connectivity leads to social isolation.

The Labour group expects to see how the borough plans to address the needs of residents within the borough, demonstrate how it supports the proposed growth in development and population in the plan by working with bus operators, planners and other local authorities such as Staffordshire County Council and Stoke on Trent City Council to get Newcastle moving and growing.

#### **Education**

The Borough of Newcastle is divided into two distinct areas for the purpose of school place planning: 1) Newcastle and 2) Kidsgrove. These areas are further broken down into smaller planning areas, which are used to determine the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools and by analysing pupil movement between schools and catchment areas.

A two-tier education system, consisting of Primary (ages 4-11) and Secondary (ages 11-16/18) schools, operates across the Borough. Sixth form provision is available on-site at two secondary schools within the district and is mainly accessible at Newcastle College, with The King's Church of England School, Kidsgrove, also providing this provision. As of September 2020, Newcastle has 30 primary schools, 1 infant school, 1 junior school, and 7 secondary schools, while Kidsgrove has 9 primary schools and 2 secondary schools.

The Infrastructure Baseline Report provided by the Council within the local plan evidence base identifies most areas of the borough have existing capacity within local primary schools to satisfy the proposed developments within the local plan. It is noted however that Newcastle region 5 covering the villages of Silverdale and Knutton would have insufficient school places for the proposed developments on the former municipal golf course.

In the infrastructure delivery plan, the local plan proposes the development of a new primary school on the former municipal golf course:

“The relatively large amount of development set out in the plan for the Keele University corridor (with the inclusion of development site SP11) means there is an identified need for a new 1 Form of Entry (FE) primary school.”

Infrastructure delivery plan

The Labour group notes that the infrastructure baseline report does not include St John's primary school in Keele in meeting the numbers required by this development. Evidence from the school demonstrates the high number of pupils registered at the school from the villages of Silverdale and Knutton. Further, concerns have been raised by members of the governing bodies of the four existing catchment primary schools; St Johns Keele, St Luke's Silverdale, The Racecourse Silverdale and St Mary's Knutton regarding the impact of a new primary school on pupil numbers. More alarmingly, neither Staffordshire County Council, nor the Borough council have communicated with the existing primary schools, including discussions over expansion. The Labour group notes that the Borough council has held conversations with St Chads Kidsgrove, Sir John Offley Madeley and Baldwins Gate primary schools over expansions to their existing estate to sustain development, and therefore raises concerns over the unequitable approach to the schools in the Keele, Knutton and Silverdale area.

#### **Labour group proposal**

The Labour group proposes that the prior to adoption of the local plan, that the Council undertakes a consultation with existing primary schools in the Keele, Knutton and Silverdale area to determine if existing capacity can be increased through expansion of the existing estate.

#### **Health & Social Care**

Health services in England are overseen by NHS England, which operates five regional teams to commission healthcare services. NHS Midlands and East support the commissioning of services in the West Midlands in partnership with Clinical Commissioning Groups (CCGs) and Acute Trusts. Clinical Commissioning Groups, established by the Health and Social Care Act 2012, changed how primary care services are planned. They commission most NHS hospital and community services, including hospital care, rehabilitative care, urgent care, community health services, and mental health and learning disability services.

The six Clinical Commissioning Groups serving Staffordshire and Stoke-on-Trent are:

- Cannock Chase CCG
- East Staffordshire CCG
- North Staffordshire CCG
- South East Staffordshire and Seisdon Peninsula CCG
- Stafford and Surrounds CCG
- Stoke-on-Trent CCG

The focus for health and social care is on prevention and providing care outside hospitals where possible. 'Together We're Better' is the Sustainability and Transformation Partnership (STP) for Staffordshire and Stoke-on-Trent. The Staffordshire and Stoke Sustainability Transformation Plan (2016) identifies key challenges, including:

- High rates of obesity, diabetes, and smoking in certain areas.
- An ageing and growing population driving up demand.
- Frequent A&E attendance and a risk-averse staff culture.
- A notable proportion of patients with common mental health conditions.
- Higher than average urgent care activity at acute trusts due to poor primary and community infrastructure and citizen behaviours.

In January 2019, NHS England published The NHS Long Term Plan (LTP) and the Five-Year Framework for GP contract reform, setting out ambitions for the next ten years to improve patient care, health outcomes, and to deliver more coordinated primary and community care. The Five-Year Framework introduced Primary Care Networks (PCNs) as the foundation of Integrated Care Systems (ICSs). Now established, PCNs are groups of one or more GP practices serving populations of 30,000 to 50,000 patients, providing a strategic view of primary care delivery and identifying estate requirements. ICSs, set to replace STPs in April 2021, will offer strategic oversight at the regional level, identifying opportunities for integrated working across health and social care partners. By April 2022, ICSs will become statutory bodies.

The infrastructure delivery plan notes the following:

"There are three Primary Care Networks (PCNs) in Newcastle-under-Lyme (Newcastle North, Newcastle Central and Newcastle South PCNs) that serve the residents of Newcastle-under-Lyme. These comprise 17 general practices. Of the practices in Newcastle-under-Lyme, only Silverdale Medical Centre is reported to have surplus capacity to accommodate patients with all other practices reporting insufficient capacity. In summation, there are capacity issues at many locations in Newcastle-under-Lyme with some of this attributed to the level of growth experienced by the borough in recent years and a historic lack of funding for the estate via mechanisms such as the planning system"

Infrastructure delivery plan

The Labour group notes all GP practices, outside of the practice in Silverdale, which must be noted is twinned with the Town Centre practice at Ryecroft, are currently at patient capacity. The Labour group further notes that the only proposal within the Local plan is for a new GP practice on the former Golf course, though we also note that this is a relocation of an existing local practice.

### **Social care**

The Department of Health and Social Care oversees adult social care policy in England, with the Care Quality Commission acting as the independent regulator to ensure care services are safe, effective, compassionate, and high-quality.

In England, adult social care can be publicly or privately funded or provided voluntarily. Local authorities are responsible for publicly funded care and have a legal duty to provide care for those who meet nationally set needs and means tests, either by commissioning or directly delivering services.

Pressures on adult social care budgets have risen in recent years due to increasing demand (from a growing, ageing population with more long-term and multiple health conditions), reduced local government funding, and higher care costs.

Consequently, the adult social care sector is facing growing challenges, including a fragile provider market, increasing unmet needs, more strain on informal carers, reduced investment in prevention, pressure on an already overstretched care workforce, and a diminished capacity to help ease demand on the NHS.

In the infrastructure baseline report the following is noted:

"It should be noted that local demand for care services will vary based on the overall size of the population and specific population care needs, the affordability, quality and location of existing services. This is covered in more detail within Staffordshire County Council's market position statements and associated intelligence documents. Newcastle-under-Lyme currently has significant provision for extra care facilities, residential care homes & nursing homes, but it is anticipated that during the Local Plan period additional units within each of these sectors will be required."

Infrastructure baseline report

The Labour group notes that requirement of additional adult social care facilities during the local plan period. The Labour group further notes the lack of identified development within the local plan to meet the rising demands for adult social care.

### **Labour group proposals**

The Labour group proposes that before adoption of the local plan:

- I. The Council work with Staffordshire County Council to identify suitable portions of developments sites within the local plan to meet the rising demand for adult social care provision.
- II. The council work with Primary care networks to increase GP capacity across the whole of the borough.

### **Strategic Employment Sites – the case against AB2 and the case for Chatterley Valley**

The Labour group is opposed to the proposals for the AB2 employment site in Audley. Taking 80 hectares of land in the rural village of Audley out of the green belt and designating it as high-quality strategic employment site without the evidence base to do so and considering the significant recorded public opposition to the proposal appears to be flawed. The removal of green belt, the increase in traffic, noise and pollution combined with the lack of adequate local infrastructure across the locality is inappropriate, especially so when we already have Chatterley Valley strategic employment site that barely features in the Local Plan at all.

This is quite incredible considering Chatterley Valley has seen £3.5 Million investment from Staffordshire County Council into the site, alongside the £3.7 Million the borough council secured as part of the Kidsgrove Town Deal, and has seen infrastructure, utilities and access upgraded.

The Labour group further notes that under the duty to co-operate the Council did not approach Stoke-on-Trent Council, or Staffordshire County Council overuse of the Chatterley Valley development site in the local plan to meet the need for strategic employment sites. The Labour group is concerned that in the doing so, the Council has not legally satisfied the test within the Localism Act and therefore



questions the proposal to meet the need for strategic employment sites through removal of land from the green belt.

#### **Labour group proposals**

Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.

Chatterley Valley is positioned near key transport links, making it ideal for a strategic enterprise zone. It lies close to the M6 motorway, the A500 (a key artery linking Stoke-on-Trent and Crewe), and major rail links, offering excellent access to the Northwest, the Midlands, and beyond. This location provides businesses with opportunities to easily transport goods and services across the UK, potentially reducing logistics costs and improving connectivity. The North Staffordshire region, including Newcastle-under-Lyme, has a long industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services. The creation of a strategic enterprise zone in Chatterley Valley would capitalize on this local expertise, attracting investment and providing job opportunities for the region.

#### **Brownfield Redevelopment Potential**

Chatterley Valley has a significant amount of underutilized and brownfield land, which presents a perfect opportunity for redevelopment without impacting greenfield sites. Developing this area would contribute to urban regeneration, transforming it into a hub for industries like green technology, logistics, or advanced manufacturing. Redeveloping brownfield sites aligns with sustainable development goals, boosting the region's environmental credentials.

#### **Potential for Attracting Investment**

Enterprise zones offer businesses tax incentives, simplified planning, and infrastructure support, all of which would make Chatterley Valley an attractive destination for both national and international investors. By designating it a strategic enterprise zone, the area could attract new companies and startups, as well as encourage the growth of existing businesses. This could significantly boost the local economy, creating jobs and increasing regional prosperity.

Locally, this would support Newcastle-under-Lyme Borough Council's economic plans, which focus on regeneration and business growth. The Labour Group want to see a borough strategy aimed at stimulating economic growth in the Midlands and the North to reduce regional disparities. Chatterley Valley could serve as a platform for innovation and the digital economy. With the rise of Industry 4.0, the area has potential to become a centre for businesses involved in automation, artificial intelligence, and digital services. The location could also foster collaboration with nearby Keele and North Staffordshire Universities, known for its research and innovation. Such collaborations could encourage knowledge transfer and innovation-led business growth.

#### **Sustainability and Green Energy Opportunities**

Given the global focus on sustainability and green energy, Chatterley Valley offers an opportunity for eco-friendly development. The site could house businesses focused on renewable energy, energy-efficient technologies, and sustainability initiatives. This would not only contribute to the Councils net-zero goals but also attract companies prioritising sustainable operations, helping to future-proof the local economy.

#### **Adherence to genuine consultation and due process**

The Council is well aware of the large number of complaints and concerns raised at the first consultation stage of the draft plan (1st November 2021 - 13th December 2021), these were largely but not confined to, complaints around lack of face-to-face briefings, forms not being made available as stated, and technical issues and failures of the on line portal. It was clear at that time that the consultation was targeted at highly competent, computer literate regular laptop users, who could cross reference up to 200 public documents through the portal avenue to answer 37 planning specific questions. The readability of the document was poor and out of line with good practise.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100807/file47158.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf),

Labour Councillors raised concerns that the consultation was too focused on the on-line portal and digital access, which we believed would lead to exclusion for thousands of elderly residents, as well as those who did not or could not afford their own laptops, tablets or computers. We felt this approach was contrary to the community engagement and digital exclusion policies previously agreed by the Council.

The Labour welcomed the fact that these issues were focussed on in the second stage consultation and in the main remedied.

However, the Labour group raised a serious issue at a meeting of full council on 24-07-24, where Council was to approve that the plan be agreed and put forward to regulation 19 stage, that critical evidence based documents were still not available to members of council or the public.

The motion highlighting this failure is attached here:

#### **Labour Group Amendments to the Report Titled;**

#### **Newcastle-under-Lyme Borough Local Plan 2040 of the 24-07-24**

##### **Background**

The Newcastle Labour group of councillors met on Monday 22nd July to review the agenda for the meeting of full council taking place on 24-07-24. The agenda contained at item 5 - Newcastle-under-Lyme Borough Local Plan 2024. The item contains the paper which asks members and council to approve four recommendations as follows;

*That Council:*

1. Approves the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme;

2. Authorises the Service Director (Planning), in consultation with the Strategic Planning Portfolio Holder to make any necessary minor typographical changes and modifications to the Final Draft

*Newcastle-under-Lyme Borough Local Plan 2040, Sustainability Appraisal and Habitat Regulations Assessment prior to consultation;*  
*3. Subject to the outcome of consultation, and if no matters are raised that materially impact upon the Plan strategy, authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024;*  
*4. Authorises the Service Director (Planning) to write to the appointed Inspector(s) at the start of the examination of the Final Draft Newcastle under-Lyme Borough Local Plan 2040 requesting them, under section 20(7C) of the Planning and Compulsory Purchase Act 2004, to recommend any main modifications necessary to ensure the Plan sound and legally compliant.*

#### **Issues identified**

##### **In relation to recommendation 1**

When the Labour group met on the 22-07-24, some 48 hours before the meeting to consider the recommendations we observed that the following supporting documents (none exhaustive) were not available;

1. Infrastructure Delivery Plan
2. Infrastructure Delivery Schedule
3. Strategic Housing and Employment land availability assessment 2024
4. Site assessments
5. Green Belt Assessment
6. Strategic transport assessment
7. Water cycle study
8. Gypsy and traveller site selection report
9. Duty to co-operate statement of compliance
10. Housing supply and delivery position statement

Clearly, the expectation that members approve a local plan through to the regulation 19 representation period, which is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination, is unreasonable and does not adhere to sound governance of the council.

This is a formal process that requires comments on the soundness and legal compliance of the plan.

Members wish to be in a fully informed position in order to move the plan through its statutory process.

##### **In relation to recommendation 3**

Consultation is technically any activity that gives people a voice, in this context it is an exercise to provide local residents, businesses and stakeholders a voice and an opportunity to influence important decisions relating to the Borough's local plan.

Consultation requires listening to local people and learning from affected people before decisions are made or priorities are set.

Councils have a statutory requirement to consult their residents, this is especially true for planning or redevelopments. There are strict rules surrounding how consultations are conducted, and a failure to adhere to this could render the council liable for a judicial review.

It is in this regard that recommendation 3 is manifestly problematic – to agree to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024, without affording council the time and space to review the consultation, in full, and to take account of residents, business and stakeholders views in our plan before submitting to the Secretary of State, does not accord with the fundamental principles of consultation compliance. A failure to demonstrate that council has undertaken meaningful consultation could leave council open to complaints of pre-determination.

The most common failures of local authority plans are due to inconsistencies with National Planning Policy, lack of evidence base and inadequate engagement. The amendments below seek to remedy any possible flaws in the plan and process. It is our view that a failure to do so would open the authority to the risk of litigation, reputational damage, and a loss of trust and confidence by those engaging with the process.

#### **Proposed amendments**

Replace recommendation(s) 1 and 3 with the following;

1. Council agrees to bring the final draft plan, and supporting documents to the September 2024 full council meeting seeking councils approval of the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme.
3. Following completion of the consultation, council will meet to receive and consider the responses. If council agrees that no amendments to the plan are required and no matters are raised that materially impact upon the Plan strategy, council authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination at the earliest opportunity.

ENDS

#### **Amendment Proposer**

Cllr Dave Jones

#### **Amendment Seconder**

Cllr Andrew Fox-Hewitt

In response to this motion highlighting critical failures of due process, the Conservative group voted to dismiss the recommendations and voted to proceed to approve the plan through to regulation 19 stage. The Leader of the Council, Cllr Simon Tagg stated at this meeting that it was not true that documents were unavailable prior to group meetings on the 22nd July, Subsequently to the council meeting however, a complaint and request under the Freedom of Information Act was made to provide details of when documents were made available. The Council response is here; (Table available in attachment)

	<p>As can be seen from the response, a total of 9 documents were in fact unavailable. The Labour Group therefore has serious concerns with the adherence to due process the probity of the Leaders actions in response to these issues being identified.</p> <p><b>Conclusion</b></p> <p>In summary whilst there is much within the Local Plan the Labour group can support, there are several weaknesses that we feel need to be addressed before the Local Plan can be adopted. These include:</p> <p>I. Clear targets and delivery plan to ensure the ever-increasing demand for affordable and social housing is met over the lifetime of this Local plan.</p> <p>II. Development of an integrated transport plan, including costings and delivery plan that is not subject solely to 106 contributions.</p> <p>III. Work with existing primary schools in Knutton, Silverdale and Keele to explore potential expansion of their existing estate to increase pupil capacity.</p> <p>IV. Work with Staffordshire County Council to identify capacity within proposed developments for provision of adult social care facilities.</p> <p>V. Work with Primary Care Networks to identify mechanisms to increase GP capacity across the borough.</p> <p>VI. Work with Staffordshire County Council and Stoke-on-Trent City Council to identify capacity within the Chatterley Valley site to accommodate the need for employment sites.</p> <p>Further, the failure to co-operate on sharing of a major strategic employment site at Chatterley Valley, and concerns raised over the consultation process and availability of essential documents; further questions the plans compliance with the Localism Act.</p>
<b>Q10 File 1</b>	6392590
<b>Attachments</b>	<a href="#">1364354 Cllr David Jones.pdf</a>
<b>Comment ID</b>	NULLP1498
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Cllr David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q6 Details</b>	<p><b>Introduction</b></p> <p>The Labour group on Newcastle-under-Lyme Borough council represents the authority's principal opposition group. The group comprises of 18 of the 44 total council members on the authority. Throughout the local plan process, the Labour group has scrutinised the plan, when afforded opportunity to do so, during scrutiny committee, planning committee and full council. Though several recommendations have been proposed, these have not been taken into account by the administration, and therefore the final version of the plan (at Regulation 19 stage) has not taken account of opposition suggestions. This response outlines several concerns that we feel critical to the success of the plan, and pertinent to the planning inspector during official examination of the plan.</p> <p><b>Overview</b></p> <p>The Labour group acknowledges the significant amount of work put into preparation of the regulation 19 pre-submission draft local plan. The Labour group acknowledges the need for a functional and sustainable local plan to ensure development within the borough is guided towards areas of unmet need, or suitability. We wish to be clear that there are many areas of the proposed plan that we agree with and support. However, there are areas of the plan where we have concerns. Whilst these concerns make up most of our comments, they are presented with due respect to several areas of the plan where we agree. We are committed to getting good value for money on behalf of our residents and delivering economic growth, but also protecting green spaces. Therefore, we are unable to support the plan in its current form, where the plans aspirations are unlikely to be matched by realised commitments. Our specific concerns, and proposals to help alleviate these are as follows:</p> <p><b>Housing Targets</b></p> <p>During Regulation 18 examination of the local plan the Labour group raised concerns over the adoption of a housing target of a minimum of 8,000 dwellings from 2020-40 equating to 400 dwellings per annum. Our objections to this housing target were based on a national minimum housing target calculation of 330 p.a. We further note that the housing and economic needs assessment commissioned by the council models a housing need of 347 p.a.1. In providing evidence for the adopted housing target of 400 dwellings p.a. the council relies on modelling provided by the housing and economic needs assessment update that suggests a forecast job creation of at mid-point between modelling forecasts 207 p.a.1, with a blended approach suggesting 237 p.a.</p> <p>The Labour group notes the concern raised over available modelling data in the Turley Report:</p> <p><i>"These are though becoming dated, with each provider having released new forecasts in the last year which envisage the creation of between 194 and 364 new jobs per annum between 2023 and 2040. Either would represent an improvement on the past trend, with Newcastle-under-Lyme having created only 20 jobs per annum on average since 2009, but the higher forecast – from Cambridge Econometrics – appears particularly optimistic given that it adds 100 jobs per year to its previous forecast, presented in the HENAU. This appears due to an unexplained upgrading of the growth prospects of three sectors that have not actually created any jobs in Newcastle-under-Lyme over the past five years, suggesting a need for caution before assuming that these sectors will indeed create far more jobs than forecast only a year ago."</i></p> <p>Turley (March 2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme</p>

Based on these job growth forecasts, the report recommends a housing need of 400 dwellings p.a. The Labour group notes that the Regulation 19 Draft Plan identifies a housing need of 400 dwellings p.a. Consistent with this assumed significant growth forecast in jobs p.a., whilst noting that such housing numbers would be dependant on a 1085% increase in job creation p.a. The Labour group has significant concerns that the level of house building will not match job growth, and thus raises objection to the sustainability of these developments.

#### **Delivering Affordable and Social Housing**

The Regulation 19 Draft Plan does not set specific targets for delivery of affordable or social housing. With no clear target on delivery, the Labour group has significant concerns that over the lifetime of the plan limited development of these much-needed dwellings will occur.

The Turley report identifies a calculated need of 278 affordable homes p.a. Whilst challenged on this number, the report does highlight the growing demand on the housing register but assumes that this growth will be met through rising earnings and private sector offerings. The Labour group challenges this assertion, given that wage growth has vastly tracked behind house price, and average rental costs, growth; and that mortgage affordability has been impacted by a significant rise in the Bank of England base rates. The Labour group has concerns that such assumptions will lead to an under-delivery of affordable homes.

The Regulation 19 Draft Plan recommends a number of policies for delivery of affordable and social housing. These are formed under Policy HOU1 Affordable Housing and include:

*“On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:*

*a. 30% of all units on greenfield sites.*

*b. 15% of all units on brownfield sites within the ‘low value zone’ as shown on the policies map.*

*c. 25% of units on brownfield sites within the ‘high value zone’ as shown on the policies map.”*

*“Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time”*

Unfortunately, at the time of writing we have not been able to locate within the Policies Map document any reference to distribution of sites across ‘low vale’ and ‘high value’ zones. However, on the assumption that delivery across non-greenfield sites will amount to 20% of dwellings in developments of 10 dwellings or more, or 0.5ha in size. On this assumption of the 400 dwellings-built p.a, only 80 p.a will be affordable or social housing. This is dramatically below the number of affordable of social rent dwellings needed. Whilst the plan mentions delivering affordable housing, the Labour Group finds no tangible commitments that provide reassurance of its delivery. Current housing policy has largely failed to produce affordable housing due to systemic issues affecting supply, demand, and financing. The introduction of ‘Right to Buy’ has seen local authorities struggle to replace housing stock, while lengthy approval processes, excessive regulations, and permitting delays have hindered new builds. Rising construction costs, driven by increased material prices, labour shortages, and supply chain issues, have pushed developers towards high-end housing. Limited government support, insufficient subsidies, and poorly targeted incentives have compounded the problem, with the previous government (2010-2024) failing to allocate adequate funding or attract developers. Housing is increasingly treated as an investment asset, with speculative bubbles inflating prices and reducing affordability. Ineffective policies, such as underfunded public housing and rent controls, exacerbate these challenges. In areas like Newcastle-under-Lyme and wider North Staffordshire, wages lag behind housing costs, leading to an affordability gap. Existing rental assistance schemes are often inadequate, failing to cover the full rent cost, and there is a failure to address the needs of the homeless and vulnerable populations, leaving affordable housing out of reach for those who need it most.

The Labour group believes the policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a. That whilst the commitment to secure between 15-30% of dwellings as affordable homes is a good first step. To meet the demand required, the policy would need to see 70% of new developments as affordable or socially rented. Whilst the Labour group accepts that this percentage would potentially deter developers, we have significant concern that the current 15-30% range will not be met. Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough. The Labour group proposes a recommendation to improve the deliverability of affordable and social housing.

#### **Labour group proposal**

That for developments on public owned land, the minimum percentage of dwellings allocated for affordable and social rented homes is increased to 50%. Given that several large housing developments will occur on either Borough or County Council owned land, and increased allocation in these areas, where land purchase is not necessary will address significant shortfall between anticipated built and need.

Further, whilst outside of the material considerations for the local plan, the Labour group proposes that the Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient.

The Council generally works with housing developers and other stakeholders to facilitate affordable housing projects – but these have not and will not meet the demand or provide the foundations required for the next twenty years. The argument for our council returning to build council houses revolves around several key points, emphasising the need for more affordable housing, the limitations of private market solutions, and the role of public investment in addressing the housing crisis.

If council builds and retains its housing stock, we create long-term assets that generate rental income and remain under public control. This is a sustainable approach to housing provision, as opposed to relying solely on private developers who may prioritise short-term profit over community needs.



Our proposal to return to council housebuilding is seen by our group as a crucial solution to the affordable housing crisis. By taking control of housing supply, council can directly address the needs of vulnerable residents, provide stability, and counter the failures of market-driven housing policies. Investing in council housing is also a long-term, sustainable approach that can contribute to the overall health and well-being of communities within the Borough.

### Transport

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

Bus services connect the main towns in Staffordshire & Stoke-on-Trent and provide cross boundary links with neighbouring authorities and towns. Whilst bus services have declined in recent years, they continue to provide vital connections between people, services and places of work and enable people to make more sustainable travel choices.

Staffordshire & Stoke-on-Trent's bus network is operated by several private operators including Arriva Midlands, First Potteries (operating 70% of services in Stoke-on-Trent), D & G, and National Express West Midlands who are significantly increasing their presence in the county. Diamond Bus, Stagecoach and Select Buses also operate services on selected routes.

Key public transport issues include congestion and unreliable journey times, limited frequency of services and falling bus patronage levels affecting commercial viability. To reduce per capita road transport emissions, Staffordshire County Council wish to improve walking, cycling and bus facilities, and are promoting their use to encourage a modal shift away from car use.

Rail connectivity in Staffordshire is currently delivered through a comprehensive rail network and several different franchises. The West Coast Main Line is 700 miles in length from London Euston to Glasgow via Birmingham providing fast services from several Staffordshire stations to London. It is one of the busiest freight routes in Europe and part of the Trans-European Transport Network (TEN-T) route, carrying 40% of all UK rail freight traffic. There are at least 14 train operator companies using this line. Cross Country operate services from the South Coast, Reading, and Birmingham to Manchester calling at Stafford and Stoke-on-Trent. The Crewe to Derby Line which runs via Stoke-on-Trent and Uttoxeter currently suffers from overcrowding.

The local plan makes no proposals to address these issues other than a reference to:

*High Speed Two (HS2) services will pass through Staffordshire when Phase 1 is operational. HS2 services will stop at Stafford Station and will improve journey times and connectivity to London and Birmingham. Phase 2b will provide further improvements in journey times and capacity from Stafford to London, Birmingham and the North West, while 27 releasing capacity on West Coast Main Line services for other Staffordshire & Stoke-on Trent stations."*

Since the publication of the draft plan the HS2 project has been scrapped by the previous Conservative government.

*"The need for a link between the M54 and the M6 was identified in the 2014 Road Investment Strategy (RIS) to relieve congestion on the A460, A449 and A5. The preferred option was announced in 2018 (and a planning application submitted in 2020) which includes a dual carriageway link between M54 J1 and M6 J11 and associated improvements. 6.9. The Midlands Connect studies for the A50 / A500 and A5 have already begun to consider how congestion issues can be addressed and growth supported along these key corridors. The case for investment and opportunities to deliver transport interventions to accelerate growth in the region are being explored. This will lead to preferred investment priorities along these routes which will likely need to be delivered to fully realise the growth potential of Staffordshire & Stoke-on-Trent."*

No further announcements on this road infrastructure have been announced.

Critically however, there is no mention of improved transport links to the Town centre or the Royal Stoke Hospital or the new planned Integrated Care Hub at Bradwell or a plan to improve connection to the rural areas of the borough.

As part of the evidence base for the local plan the Council commissioned a Strategic Transport Assessment by Sweco UK Limited. The SWECO report outlines the existing pressures on the highways network throughout the borough, including the following locations:

- *Slow moving traffic observed in and around Newcastle-under-Lyme centre,*
- *Some limited speed reductions in southern areas of Newcastle-under-Lyme Borough, Madeley and Audley,*
- *Slow moving traffic on the A34 Newcastle Road from the A500 to north of Clough Hall Drive though largely no queuing. Some traffic congestion on signalised roundabout"*

SWECO (July 2024) Strategic Transport Assessment

The draft local plan makes no reference to these existing pressures, nor does it provide any solutions to these pressures.

The SWECO report also notes the existing pressures on links to the strategic road network, notably the M6 and A500.

*"• M16 J16 - Observed data shows traffic congestion along the A500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM)*

- *M6 J15 - The speed data indicates that queued traffic (speed 1-10mph) is observed along the A500 approach to the A500 Queensway\ Newcastle Road roundabout in the PM peak,*
- *A500\Alsager Road – Can be inferred from data to be operating without any capacity related congestion,*
- *Talke Interchange - Some relatively slow-moving traffic, along the section between the Newcastle Road\Talke Road roundabout. However, the data indicates that this is slow moving traffic, but in general the data does not show any large reductions in speed due to queuing,*
- *A500/A527 - Data indicates that traffic is operating without the presence of queues long term queues during the peak hour,*
- *A500/A34 -In the AM peak observed speeds of around 20-30mph are in line with the speed limits in place on the A34. This is with the exception of the A34 northbound approach to the gyratory which shows*

lower observed speeds of around 10-20mph. In the PM peak lower speeds of 10-20mph are also observed on the southbound approach to the gyratory.”

SWECO (July 2024) Strategic Transport Assessment

Again, there are no proposals within the local plan to address these existing pressures on connectivity to the wider strategic road network.

The SWECO report modelled the impact of housing and strategic site developments on traffic flow and made the following conclusions.

Keele:

*“It can be seen that there is a further worsening from the core-only scenario with now severe congestion forecast in both directions of Keele Road between the University and Gallowstree Lane roundabout. Evidence of re-routing is seen with increases in V/C forecast for Mill Street in Silverdale. Moderate junction delay issues begin to become apparent at the signalised junction of Cemetery Road/Church Lane/B5044. These patterns are also visible in the difference plots (Figure 8-15 and Figure 8-16) where volume has increased around the B5044 (Silverdale), A525 (Keele Road) and A53. It should be noted that the NSMM model is developed within the CUBE modelling software application. A limitation of the CUBE software is that it does not model blocking back (traffic queuing back to previous road links with potential to impact other links and junctions). Therefore, there is the possibility of additional related impacts to queuing traffic on Keele Road, for example to the Keele University roundabout.”*

SWECO (July 2024) Strategic Transport Assessment

The report recommends mitigations at Keele:

*“A new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525.*

*A new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road.”*

*The report notes the impact of these mitigation measures:*

*For Keele, the mitigation measure of a new link road added between the University and Whitmore Road is seen to have a positive impact on the reduction of traffic on Keele Road between the University Roundabout and Gallowstree Lane.*

*It can be seen that during the AM period, westbound traffic is most improved whilst in the PM period, eastbound traffic is most improved. This is likely to be of significant improvement for University traffic and related bus services.*

*It can also be seen that the mitigation brings volume back or nearly back to capacity for each direction and period. There is potential for additional improvements to be made with high impact travel plans and other local bus service improvements.”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes that this report only mitigates the impact of the proposed developments, and in doing so “brings volume back or nearly back to capacity for each direction and period”. The Labour group has significant concerns that the mitigation measures proposed in the report are not sufficient to provide long-term sustainable traffic flow in the area.

The report recommends the following mitigations at Audley:

*“Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour.”*

SWECO (July 2024) Strategic Transport Assessment

The report recommends the following mitigation measures in Talke:

*“Extension of the NW-bound Newcastle Road two-lane approach to the signalised junction at Newcastle Road/Coalpit Hill. This will give additional space for right-turning traffic that is leading to junction delay issues in scenario 2 – core local plan sites.*

*Cedar Avenue – Community improvements to Cedar Avenue to increase attractiveness of walking, wheeling, and cycling (not able to model in the strategic NSMM transport model).”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes the Local plan has identified mitigation measures at Keele and Talke:

*“13. Transport infrastructure identified through the Strategic Transport Assessment will be supported. This is to include: - a. a link road between A525 Keele Road and Whitmore Road. b. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)”*

SWECO (July 2024) Strategic Transport Assessment

Labour group notes that funding for these mitigation measures will be identified via 106 funding levied on developments in the area. The Labour group has significant concerns that mitigating the impact of these developments will require 106 funding, and that given the impact of rising cost of living, several developments have proceeded following waiver of the 106 funding requirements. We note within the councils own Infrastructure Baseline Report the following:

*“At the same time, it is critical that any infrastructure expectations do not disincentivise development to such an extent that it becomes unviable, thus inhibiting Newcastle-under-Lyme’s growth opportunities. This challenge is particularly acute in those parts of Newcastle-under-Lyme where land and property values are low and profit margins on development are small or even non-existent. In some parts of the Borough, the private sector will not be able to meet all of the infrastructure/policy requirements which are ultimately set out in the Local Plan. In such cases, an appropriate balance will need to be struck between competing interests and demands.”*

NBC (July 2024) Infrastructure Baseline Report

The Labour group also notes the Strategic Transport Assessment provided by the SWECO report does not include assessment of the impact of public transport, outside of assumed reductions in car usage. The borough of Newcastle-under-Lyme, like many other post-industrial non-metropolitan districts, can be considered as a deprived public transport area. Within the borough, public transport is provided via the bus network, and thus subject to the impact of increased traffic and lack of mitigation. At present,



travel from Newcastle to connecting rail network stations at Stoke is a 40-minute bus journey outside of periods of high traffic congestion, with a 1 hour journey to Crewe. The Labour group has concerns that the local plan, whilst referring to increased walking and cycling, has no reference to improving the outdated, inefficient, and poor provision of existing public transport across the borough.

#### **Labour group proposal**

The Labour group wants to see the local plan have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of our communities. That such integrated transport plan involves the combining of different modes of transport to maximise ease and efficiency for the user in terms of time, cost, comfort, safety, accessibility and convenience. We are aware that the cuts to bus routes and times across the borough are leading to difficulties in accessing employment, education and health services. We also know that lack of connectivity leads to social isolation.

The Labour group expects to see how the borough plans to address the needs of residents within the borough, demonstrate how it supports the proposed growth in development and population in the plan by working with bus operators, planners and other local authorities such as Staffordshire County Council and Stoke on Trent City Council to get Newcastle moving and growing.

#### **Education**

The Borough of Newcastle is divided into two distinct areas for the purpose of school place planning: 1) Newcastle and 2) Kidsgrove. These areas are further broken down into smaller planning areas, which are used to determine the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools and by analysing pupil movement between schools and catchment areas.

A two-tier education system, consisting of Primary (ages 4-11) and Secondary (ages 11-16/18) schools, operates across the Borough. Sixth form provision is available on-site at two secondary schools within the district and is mainly accessible at Newcastle College, with The King's Church of England School, Kidsgrove, also providing this provision. As of September 2020, Newcastle has 30 primary schools, 1 infant school, 1 junior school, and 7 secondary schools, while Kidsgrove has 9 primary schools and 2 secondary schools.

The Infrastructure Baseline Report provided by the Council within the local plan evidence base identifies most areas of the borough have existing capacity within local primary schools to satisfy the proposed developments within the local plan. It is noted however that Newcastle region 5 covering the villages of Silverdale and Knutton would have insufficient school places for the proposed developments on the former municipal golf course.

In the infrastructure delivery plan, the local plan proposes the development of a new primary school on the former municipal golf course:

"The relatively large amount of development set out in the plan for the Keele University corridor (with the inclusion of development site SP11) means there is an identified need for a new 1 Form of Entry (FE) primary school."

#### **Infrastructure delivery plan**

The Labour group notes that the infrastructure baseline report does not include St John's primary school in Keele in meeting the numbers required by this development. Evidence from the school demonstrates the high number of pupils registered at the school from the villages of Silverdale and Knutton. Further, concerns have been raised by members of the governing bodies of the four existing catchment primary schools; St Johns Keele, St Luke's Silverdale, The Racecourse Silverdale and St Mary's Knutton regarding the impact of a new primary school on pupil numbers. More alarmingly, neither Staffordshire County Council, nor the Borough council have communicated with the existing primary schools, including discussions over expansion. The Labour group notes that the Borough council has held conversations with St Chads Kidsgrove, Sir John Offley Madeley and Baldwins Gate primary schools over expansions to their existing estate to sustain development, and therefore raises concerns over the unequitable approach to the schools in the Keele, Knutton and Silverdale area.

#### **Labour group proposal**

The Labour group proposes that the prior to adoption of the local plan, that the Council undertakes a consultation with existing primary schools in the Keele, Knutton and Silverdale area to determine if existing capacity can be increased through expansion of the existing estate.

#### **Health & Social Care**

Health services in England are overseen by NHS England, which operates five regional teams to commission healthcare services. NHS Midlands and East support the commissioning of services in the West Midlands in partnership with Clinical Commissioning Groups (CCGs) and Acute Trusts. Clinical Commissioning Groups, established by the Health and Social Care Act 2012, changed how primary care services are planned. They commission most NHS hospital and community services, including hospital care, rehabilitative care, urgent care, community health services, and mental health and learning disability services.

The six Clinical Commissioning Groups serving Staffordshire and Stoke-on-Trent are:

- Cannock Chase CCG
- East Staffordshire CCG
- North Staffordshire CCG
- South East Staffordshire and Seisdon Peninsula CCG
- Stafford and Surrounds CCG
- Stoke-on-Trent CCG

The focus for health and social care is on prevention and providing care outside hospitals where possible. 'Together We're Better' is the Sustainability and Transformation Partnership (STP) for Staffordshire and Stoke-on-Trent. The Staffordshire and Stoke Sustainability Transformation Plan (2016) identifies key challenges, including:

- High rates of obesity, diabetes, and smoking in certain areas.
- An ageing and growing population driving up demand.
- Frequent A&E attendance and a risk-averse staff culture.
- A notable proportion of patients with common mental health conditions.

- Higher than average urgent care activity at acute trusts due to poor primary and community infrastructure and citizen behaviours.

In January 2019, NHS England published The NHS Long Term Plan (LTP) and the Five-Year Framework for GP contract reform, setting out ambitions for the next ten years to improve patient care, health outcomes, and to deliver more coordinated primary and community care. The Five-Year Framework introduced Primary Care Networks (PCNs) as the foundation of Integrated Care Systems (ICSs).

Now established, PCNs are groups of one or more GP practices serving populations of 30,000 to 50,000 patients, providing a strategic view of primary care delivery and identifying estate requirements. ICSs, set to replace STPs in April 2021, will offer strategic oversight at the regional level, identifying opportunities for integrated working across health and social care partners. By April 2022, ICSs will become statutory bodies.

The infrastructure delivery plan notes the following:

"There are three Primary Care Networks (PCNs) in Newcastle-under-Lyme (Newcastle North, Newcastle Central and Newcastle South PCNs) that serve the residents of Newcastle-under-Lyme. These comprise 17 general practices. Of the practices in Newcastle-under-Lyme, only Silverdale Medical Centre is reported to have surplus capacity to accommodate patients with all other practices reporting insufficient capacity. In summation, there are capacity issues at many locations in Newcastle-under-Lyme with some of this attributed to the level of growth experienced by the borough in recent years and a historic lack of funding for the estate via mechanisms such as the planning system"

Infrastructure delivery plan

The Labour group notes all GP practices, outside of the practice in Silverdale, which must be noted is twinned with the Town Centre practice at Ryecroft, are currently at patient capacity. The Labour group further notes that the only proposal within the Local plan is for a new GP practice on the former Golf course, though we also note that this is a relocation of an existing local practice.

### **Social care**

The Department of Health and Social Care oversees adult social care policy in England, with the Care Quality Commission acting as the independent regulator to ensure care services are safe, effective, compassionate, and high-quality.

In England, adult social care can be publicly or privately funded or provided voluntarily. Local authorities are responsible for publicly funded care and have a legal duty to provide care for those who meet nationally set needs and means tests, either by commissioning or directly delivering services.

Pressures on adult social care budgets have risen in recent years due to increasing demand (from a growing, ageing population with more long-term and multiple health conditions), reduced local government funding, and higher care costs.

Consequently, the adult social care sector is facing growing challenges, including a fragile provider market, increasing unmet needs, more strain on informal carers, reduced investment in prevention, pressure on an already overstretched care workforce, and a diminished capacity to help ease demand on the NHS.

In the infrastructure baseline report the following is noted:

"It should be noted that local demand for care services will vary based on the overall size of the population and specific population care needs, the affordability, quality and location of existing services. This is covered in more detail within Staffordshire County Council's market position statements and associated intelligence documents. Newcastle-under-Lyme currently has significant provision for extra care facilities, residential care homes & nursing homes, but it is anticipated that during the Local Plan period additional units within each of these sectors will be required."

Infrastructure baseline report

The Labour group notes that requirement of additional adult social care facilities during the local plan period. The Labour group further notes the lack of identified development within the local plan to meet the rising demands for adult social care.

### **Labour group proposals**

The Labour group proposes that before adoption of the local plan:

- I. The Council work with Staffordshire County Council to identify suitable portions of developments sites within the local plan to meet the rising demand for adult social care provision.
- II. The council work with Primary care networks to increase GP capacity across the whole of the borough.

### **Strategic Employment Sites – the case against AB2 and the case for Chatterley Valley**

The Labour group is opposed to the proposals for the AB2 employment site in Audley. Taking 80 hectares of land in the rural village of Audley out of the green belt and designating it as high-quality strategic employment site without the evidence base to do so and considering the significant recorded public opposition to the proposal appears to be flawed. The removal of green belt, the increase in traffic, noise and pollution combined with the lack of adequate local infrastructure across the locality is inappropriate, especially so when we already have Chatterley Valley strategic employment site that barely features in the Local Plan at all.

This is quite incredible considering Chatterley Valley has seen £3.5 Million investment from Staffordshire County Council into the site, alongside the £3.7 Million the borough council secured as part of the Kidsgrove Town Deal, and has seen infrastructure, utilities and access upgraded.

The Labour group further notes that under the duty to co-operate the Council did not approach Stoke-on-Trent Council, or Staffordshire County Council overuse of the Chatterley Valley development site in the local plan to meet the need for strategic employment sites. The Labour group is concerned that in the doing so, the Council has not legally satisfied the test within the Localism Act and therefore questions the proposal to meet the need for strategic employment sites through removal of land from the green belt.

### **Labour group proposals**

Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.

Chatterley Valley is positioned near key transport links, making it ideal for a strategic enterprise zone. It lies close to the M6 motorway, the A500 (a key artery linking Stoke-on-Trent and Crewe), and major rail links, offering excellent access to the Northwest, the Midlands, and beyond. This location provides businesses with opportunities to easily transport goods and services across the UK, potentially reducing logistics costs and improving connectivity. The North Staffordshire region, including Newcastle-under-Lyme, has a long industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services. The creation of a strategic enterprise zone in Chatterley Valley would capitalize on this local expertise, attracting investment and providing job opportunities for the region.

#### **Brownfield Redevelopment Potential**

Chatterley Valley has a significant amount of underutilized and brownfield land, which presents a perfect opportunity for redevelopment without impacting greenfield sites. Developing this area would contribute to urban regeneration, transforming it into a hub for industries like green technology, logistics, or advanced manufacturing. Redeveloping brownfield sites aligns with sustainable development goals, boosting the region's environmental credentials.

#### **Potential for Attracting Investment**

Enterprise zones offer businesses tax incentives, simplified planning, and infrastructure support, all of which would make Chatterley Valley an attractive destination for both national and international investors. By designating it a strategic enterprise zone, the area could attract new companies and startups, as well as encourage the growth of existing businesses. This could significantly boost the local economy, creating jobs and increasing regional prosperity.

Locally, this would support Newcastle-under-Lyme Borough Council's economic plans, which focus on regeneration and business growth. The Labour Group want to see a borough strategy aimed at stimulating economic growth in the Midlands and the North to reduce regional disparities. Chatterley Valley could serve as a platform for innovation and the digital economy. With the rise of Industry 4.0, the area has potential to become a centre for businesses involved in automation, artificial intelligence, and digital services. The location could also foster collaboration with nearby Keele and North Staffordshire Universities, known for its research and innovation. Such collaborations could encourage knowledge transfer and innovation-led business growth.

#### **Sustainability and Green Energy Opportunities**

Given the global focus on sustainability and green energy, Chatterley Valley offers an opportunity for eco-friendly development. The site could house businesses focused on renewable energy, energy-efficient technologies, and sustainability initiatives. This would not only contribute to the Councils net-zero goals but also attract companies prioritising sustainable operations, helping to future-proof the local economy.

#### **Adherence to genuine consultation and due process**

The Council is well aware of the large number of complaints and concerns raised at the first consultation stage of the draft plan (1st November 2021 - 13th December 2021), these were largely but not confined to, complaints around lack of face-to-face briefings, forms not being made available as stated, and technical issues and failures of the on line portal. It was clear at that time that the consultation was targeted at highly competent, computer literate regular laptop users, who could cross reference up to 200 public documents through the portal avenue to answer 37 planning specific questions. The readability of the document was poor and out of line with good practise.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100807/file47158.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf),

Labour Councillors raised concerns that the consultation was too focused on the on-line portal and digital access, which we believed would lead to exclusion for thousands of elderly residents, as well as those who did not or could not afford their own laptops, tablets or computers. We felt this approach was contrary to the community engagement and digital exclusion policies previously agreed by the Council.

The Labour welcomed the fact that these issues were focussed on in the second stage consultation and in the main remedied.

However, the Labour group raised a serious issue at a meeting of full council on 24-07-24, where Council was to approve that the plan be agreed and put forward to regulation 19 stage, that critical evidence based documents were still not available to members of council or the public.

The motion highlighting this failure is attached here:

#### **Labour Group Amendments to the Report Titled; Newcastle-under-Lyme Borough Local Plan 2040 of the 24-07-24**

##### **Background**

The Newcastle Labour group of councillors met on Monday 22nd July to review the agenda for the meeting of full council taking place on 24-07-24. The agenda contained at item 5 - Newcastle-under-Lyme Borough Local Plan 2024. The item contains the paper which asks members and council to approve four recommendations as follows;

*That Council: .*

- 1. Approves the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme;*
- 2. Authorises the Service Director (Planning), in consultation with the Strategic Planning Portfolio Holder to make any necessary minor typographical changes and modifications to the Final Draft Newcastle-under-Lyme Borough Local Plan 2040, Sustainability Appraisal and Habitat Regulations Assessment prior to consultation;*
- 3. Subject to the outcome of consultation, and if no matters are raised that materially impact upon the Plan strategy, authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024;*
- 4. Authorises the Service Director (Planning) to write to the appointed Inspector(s) at the start of the examination of the Final Draft Newcastle under-Lyme Borough Local Plan 2040 requesting them, under*

section 20(7C) of the Planning and Compulsory Purchase Act 2004, to recommend any main modifications necessary to ensure the Plan sound and legally compliant.

#### **Issues identified**

##### **In relation to recommendation 1**

When the Labour group met on the 22-07-24, some 48 hours before the meeting to consider the recommendations we observed that the following supporting documents (none exhaustive) were not available;

1. Infrastructure Delivery Plan
2. Infrastructure Delivery Schedule
3. Strategic Housing and Employment land availability assessment 2024
4. Site assessments
5. Green Belt Assessment
6. Strategic transport assessment
7. Water cycle study
8. Gypsy and traveller site selection report
9. Duty to co-operate statement of compliance
10. Housing supply and delivery position statement

Clearly, the expectation that members approve a local plan through to the regulation 19 representation period, which is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination, is unreasonable and does not adhere to sound governance of the council.

This is a formal process that requires comments on the soundness and legal compliance of the plan.

Members wish to be in a fully informed position in order to move the plan through its statutory process.

##### **In relation to recommendation 3**

Consultation is technically any activity that gives people a voice, in this context it is an exercise to provide local residents, businesses and stakeholders a voice and an opportunity to influence important decisions relating to the Borough's local plan.

Consultation requires listening to local people and learning from affected people before decisions are made or priorities are set.

Councils have a statutory requirement to consult their residents, this is especially true for planning or redevelopments. There are strict rules surrounding how consultations are conducted, and a failure to adhere to this could render the council liable for a judicial review.

It is in this regard that recommendation 3 is manifestly problematic – to agree to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024, without affording council the time and space to review the consultation, in full, and to take account of residents, business and stakeholders views in our plan before submitting to the Secretary of State, does not accord with the fundamental principles of consultation compliance. A failure to demonstrate that council has undertaken meaningful consultation could leave council open to complaints of pre-determination.

The most common failures of local authority plans are due to inconsistencies with National Planning Policy, lack of evidence base and inadequate engagement. The amendments below seek to remedy any possible flaws in the plan and process. It is our view that a failure to do so would open the authority to the risk of litigation, reputational damage, and a loss of trust and confidence by those engaging with the process.

#### **Proposed amendments**

Replace recommendation(s) 1 and 3 with the following;

1. Council agrees to bring the final draft plan, and supporting documents to the September 2024 full council meeting seeking councils approval of the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme.
3. Following completion of the consultation, council will meet to receive and consider the responses. If council agrees that no amendments to the plan are required and no matters are raised that materially impact upon the Plan strategy, council authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination at the earliest opportunity.

ENDS

#### **Amendment Proposer**

Cllr Dave Jones

#### **Amendment Secondor**

Cllr Andrew Fox-Hewitt

In response to this motion highlighting critical failures of due process, the Conservative group voted to dismiss the recommendations and voted to proceed to approve the plan through to regulation 19 stage. The Leader of the Council, Cllr Simon Tagg stated at this meeting that it was not true that documents were unavailable prior to group meetings on the 22nd July,

Subsequently to the council meeting however, a complaint and request under the Freedom of Information Act was made to provide details of when documents were made available. The Council response is here; (Table available in attachment)

As can be seen from the response, a total of 9 documents were in fact unavailable. The Labour Group therefore has serious concerns with the adherence to due process the probity of the Leaders actions in response to these issues being identified.

#### **Conclusion**

In summary whilst there is much within the Local Plan the Labour group can support, there are several weaknesses that we feel need to be addressed before the Local Plan can be adopted. These include:

- I. Clear targets and delivery plan to ensure the ever-increasing demand for affordable and social housing is met over the lifetime of this Local plan.



	<p>II. Development of an integrated transport plan, including costings and delivery plan that is not subject solely to 106 contributions.</p> <p>III. Work with existing primary schools in Knutton, Silverdale and Keele to explore potential expansion of their existing estate to increase pupil capacity.</p> <p>IV. Work with Staffordshire County Council to identify capacity within proposed developments for provision of adult social care facilities.</p> <p>V. Work with Primary Care Networks to identify mechanisms to increase GP capacity across the borough.</p> <p>VI. Work with Staffordshire County Council and Stoke-on-Trent City Council to identify capacity within the Chatterley Valley site to accommodate the need for employment sites.</p> <p>Further, the failure to co-operate on sharing of a major strategic employment site at Chatterley Valley, and concerns raised over the consultation process and availability of essential documents; further questions the plans compliance with the Localism Act.</p>
Q10 File 1	6392590
Attachments	1364354 Cllr David Jones.pdf
Comment ID	NULLP1499
Order	86
Title	Policy IN1: Infrastructure
Consultee Family Name	Jones
Consultee Given Name	Cllr David
Q4 Part of document	Policy
Q4 Policy	IN1
Q6 Details	<p><b>Introduction</b></p> <p>The Labour group on Newcastle-under-Lyme Borough council represents the authority's principal opposition group. The group comprises of 18 of the 44 total council members on the authority. Throughout the local plan process, the Labour group has scrutinised the plan, when afforded opportunity to do so, during scrutiny committee, planning committee and full council. Though several recommendations have been proposed, these have not been taken into account by the administration, and therefore the final version of the plan (at Regulation 19 stage) has not taken account of opposition suggestions. This response outlines several concerns that we feel critical to the success of the plan, and pertinent to the planning inspector during official examination of the plan.</p> <p><b>Overview</b></p> <p>The Labour group acknowledges the significant amount of work put into preparation of the regulation 19 pre-submission draft local plan. The Labour group acknowledges the need for a functional and sustainable local plan to ensure development within the borough is guided towards areas of unmet need, or suitability. We wish to be clear that there are many areas of the proposed plan that we agree with and support. However, there are areas of the plan where we have concerns. Whilst these concerns make up most of our comments, they are presented with due respect to several areas of the plan where we agree. We are committed to getting good value for money on behalf of our residents and delivering economic growth, but also protecting green spaces. Therefore, we are unable to support the plan in its current form, where the plans aspirations are unlikely to be matched by realised commitments. Our specific concerns, and proposals to help alleviate these are as follows:</p> <p><b>Housing Targets</b></p> <p>During Regulation 18 examination of the local plan the Labour group raised concerns over the adoption of a housing target of a minimum of 8,000 dwellings from 2020-40 equating to 400 dwellings per annum. Our objections to this housing target were based on a national minimum housing target calculation of 330 p.a. We further note that the housing and economic needs assessment commissioned by the council models a housing need of 347 p.a.1. In providing evidence for the adopted housing target of 400 dwellings p.a. the council relies on modelling provided by the housing and economic needs assessment update that suggests a forecast job creation of at mid-point between modelling forecasts 207 p.a.1, with a blended approach suggesting 237 p.a.</p> <p>The Labour group notes the concern raised over available modelling data in the Turley Report:</p> <p><i>"These are though becoming dated, with each provider having released new forecasts in the last year which envisage the creation of between 194 and 364 new jobs per annum between 2023 and 2040. Either would represent an improvement on the past trend, with Newcastle-under-Lyme having created only 20 jobs per annum on average since 2009, but the higher forecast – from Cambridge Econometrics – appears particularly optimistic given that it adds 100 jobs per year to its previous forecast, presented in the HENAU. This appears due to an unexplained upgrading of the growth prospects of three sectors that have not actually created any jobs in Newcastle-under-Lyme over the past five years, suggesting a need for caution before assuming that these sectors will indeed create far more jobs than forecast only a year ago."</i></p> <p>Turley (March 2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme</p> <p>Based on these job growth forecasts, the report recommends a housing need of 400 dwellings p.a. The Labour group notes that the Regulation 19 Draft Plan identifies a housing need of 400 dwellings p.a. Consistent with this assumed significant growth forecast in jobs p.a., whilst noting that such housing numbers would be dependant on a 1085% increase in job creation p.a. The Labour group has significant concerns that the level of house building will not match job growth, and thus raises objection to the sustainability of these developments.</p> <p><b>Delivering Affordable and Social Housing</b></p>

The Regulation 19 Draft Plan does not set specific targets for delivery of affordable or social housing. With no clear target on delivery, the Labour group has significant concerns that over the lifetime of the plan limited development of these much-needed dwellings will occur.

The Turley report identifies a calculated need of 278 affordable homes p.a. Whilst challenged on this number, the report does highlight the growing demand on the housing register but assumes that this growth will be met through rising earnings and private sector offerings. The Labour group challenges this assertion, given that wage growth has vastly tracked behind house price, and average rental costs, growth; and that mortgage affordability has been impacted by a significant rise in the Bank of England base rates. The Labour group has concerns that such assumptions will lead to an under-delivery of affordable homes.

The Regulation 19 Draft Plan recommends a number of policies for delivery of affordable and social housing. These are formed under Policy HOU1 Affordable Housing and include:

*“On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:*

*a. 30% of all units on greenfield sites.*

*b. 15% of all units on brownfield sites within the ‘low value zone’ as shown on the policies map.*

*c. 25% of units on brownfield sites within the ‘high value zone’ as shown on the policies map.”*

*“Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time”*

Unfortunately, at the time of writing we have not been able to locate within the Policies Map document any reference to distribution of sites across ‘low vale’ and ‘high value’ zones. However, on the assumption that delivery across non-greenfield sites will amount to 20% of dwellings in developments of 10 dwellings or more, or 0.5ha in size. On this assumption of the 400 dwellings-built p.a, only 80 p.a will be affordable or social housing. This is dramatically below the number of affordable of social rent dwellings needed. Whilst the plan mentions delivering affordable housing, the Labour Group finds no tangible commitments that provide reassurance of its delivery. Current housing policy has largely failed to produce affordable housing due to systemic issues affecting supply, demand, and financing. The introduction of ‘Right to Buy’ has seen local authorities struggle to replace housing stock, while lengthy approval processes, excessive regulations, and permitting delays have hindered new builds. Rising construction costs, driven by increased material prices, labour shortages, and supply chain issues, have pushed developers towards high-end housing. Limited government support, insufficient subsidies, and poorly targeted incentives have compounded the problem, with the previous government (2010-2024) failing to allocate adequate funding or attract developers. Housing is increasingly treated as an investment asset, with speculative bubbles inflating prices and reducing affordability. Ineffective policies, such as underfunded public housing and rent controls, exacerbate these challenges. In areas like Newcastle-under-Lyme and wider North Staffordshire, wages lag behind housing costs, leading to an affordability gap. Existing rental assistance schemes are often inadequate, failing to cover the full rent cost, and there is a failure to address the needs of the homeless and vulnerable populations, leaving affordable housing out of reach for those who need it most.

The Labour group believes the policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a. That whilst the commitment to secure between 15-30% of dwellings as affordable homes is a good first step. To meet the demand required, the policy would need to see 70% of new developments as affordable or socially rented. Whilst the Labour group accepts that this percentage would potentially deter developers, we have significant concern that the current 15-30% range will not be met. Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough. The Labour group proposes a recommendation to improve the deliverability of affordable and social housing.

#### **Labour group proposal**

That for developments on public owned land, the minimum percentage of dwellings allocated for affordable and social rented homes is increased to 50%. Given that several large housing developments will occur on either Borough or County Council owned land, and increased allocation in these areas, where land purchase is not necessary will address significant shortfall between anticipated built and need.

Further, whilst outside of the material considerations for the local plan, the Labour group proposes that the Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient.

The Council generally works with housing developers and other stakeholders to facilitate affordable housing projects – but these have not and will not meet the demand or provide the foundations required for the next twenty years. The argument for our council returning to build council houses revolves around several key points, emphasising the need for more affordable housing, the limitations of private market solutions, and the role of public investment in addressing the housing crisis.

If council builds and retains its housing stock, we create long-term assets that generate rental income and remain under public control. This is a sustainable approach to housing provision, as opposed to relying solely on private developers who may prioritise short-term profit over community needs.

Our proposal to return to council housebuilding is seen by our group as a crucial solution to the affordable housing crisis. By taking control of housing supply, council can directly address the needs of vulnerable residents, provide stability, and counter the failures of market-driven housing policies. Investing in council housing is also a long-term, sustainable approach that can contribute to the overall health and well-being of communities within the Borough.

#### **Transport**



It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

Bus services connect the main towns in Staffordshire & Stoke-on-Trent and provide cross boundary links with neighbouring authorities and towns. Whilst bus services have declined in recent years, they continue to provide vital connections between people, services and places of work and enable people to make more sustainable travel choices.

Staffordshire & Stoke-on-Trent's bus network is operated by several private operators including Arriva Midlands, First Potteries (operating 70% of services in Stoke-on-Trent), D & G, and National Express West Midlands who are significantly increasing their presence in the county. Diamond Bus, Stagecoach and Select Buses also operate services on selected routes.

Key public transport issues include congestion and unreliable journey times, limited frequency of services and falling bus patronage levels affecting commercial viability. To reduce per capita road transport emissions, Staffordshire County Council wish to improve walking, cycling and bus facilities, and are promoting their use to encourage a modal shift away from car use.

Rail connectivity in Staffordshire is currently delivered through a comprehensive rail network and several different franchises. The West Coast Main Line is 700 miles in length from London Euston to Glasgow via Birmingham providing fast services from several Staffordshire stations to London. It is one of the busiest freight routes in Europe and part of the Trans-European Transport Network (TEN-T) route, carrying 40% of all UK rail freight traffic. There are at least 14 train operator companies using this line. Cross Country operate services from the South Coast, Reading, and Birmingham to Manchester calling at Stafford and Stoke-on-Trent. The Crewe to Derby Line which runs via Stoke-on-Trent and Uttoxeter currently suffers from overcrowding.

The local plan makes no proposals to address these issues other than a reference to:

*High Speed Two (HS2) services will pass through Staffordshire when Phase 1 is operational. HS2 services will stop at Stafford Station and will improve journey times and connectivity to London and Birmingham. Phase 2b will provide further improvements in journey times and capacity from Stafford to London, Birmingham and the North West, while 27 releasing capacity on West Coast Main Line services for other Staffordshire & Stoke-on Trent stations."*

Since the publication of the draft plan the HS2 project has been scrapped by the previous Conservative government.

*"The need for a link between the M54 and the M6 was identified in the 2014 Road Investment Strategy (RIS) to relieve congestion on the A460, A449 and A5. The preferred option was announced in 2018 (and a planning application submitted in 2020) which includes a dual carriageway link between M54 J1 and M6 J11 and associated improvements. 6.9. The Midlands Connect studies for the A50 / A500 and A5 have already begun to consider how congestion issues can be addressed and growth supported along these key corridors. The case for investment and opportunities to deliver transport interventions to accelerate growth in the region are being explored. This will lead to preferred investment priorities along these routes which will likely need to be delivered to fully realise the growth potential of Staffordshire & Stoke-on-Trent."*

No further announcements on this road infrastructure have been announced.

Critically however, there is no mention of improved transport links to the Town centre or the Royal Stoke Hospital or the new planned Integrated Care Hub at Bradwell or a plan to improve connection to the rural areas of the borough.

As part of the evidence base for the local plan the Council commissioned a Strategic Transport Assessment by Sweco UK Limited. The SWECO report outlines the existing pressures on the highways network throughout the borough, including the following locations:

- *Slow moving traffic observed in and around Newcastle-under-Lyme centre,*
- *Some limited speed reductions in southern areas of Newcastle-under-Lyme Borough, Madeley and Audley,*
- *Slow moving traffic on the A34 Newcastle Road from the A500 to north of Clough Hall Drive though largely no queuing. Some traffic congestion on signalised roundabout"*

SWECO (July 2024) Strategic Transport Assessment

The draft local plan makes no reference to these existing pressures, nor does it provide any solutions to these pressures.

The SWECO report also notes the existing pressures on links to the strategic road network, notably the M6 and A500.

- *M16 J16 - Observed data shows traffic congestion along the A500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM)*
- *M6 J15 - The speed data indicates that queued traffic (speed 1-10mph) is observed along the A500 approach to the A500 Queensway\ Newcastle Road roundabout in the PM peak,*
- *A500\Alsager Road – Can be inferred from data to be operating without any capacity related congestion,*
- *Talke Interchange - Some relatively slow-moving traffic, along the section between the Newcastle Road\Talke Road roundabout. However, the data indicates that this is slow moving traffic, but in general the data does not show any large reductions in speed due to queuing,*
- *A500/A527 - Data indicates that traffic is operating without the presence of queues long term queues during the peak hour,*
- *A500/A34 -In the AM peak observed speeds of around 20-30mph are in line with the speed limits in place on the A34. This is with the exception of the A34 northbound approach to the gyratory which shows lower observed speeds of around 10-20mph. In the PM peak lower speeds of 10-20mph are also observed on the southbound approach to the gyratory."*

SWECO (July 2024) Strategic Transport Assessment

Again, there are no proposals within the local plan to address these existing pressures on connectivity to the wider strategic road network.

The SWECO report modelled the impact of housing and strategic site developments on traffic flow and made the following conclusions.

Keele:

*"It can be seen that there is a further worsening from the core-only scenario with now severe congestion forecast in both directions of Keele Road between the University and Gallowstree Lane roundabout. Evidence of re-routing is seen with increases in V/C forecast for Mill Street in Silverdale. Moderate junction delay issues begin to become apparent at the signalised junction of Cemetery Road/Church Lane/B5044. These patterns are also visible in the difference plots (Figure 8-15 and Figure 8-16) where volume has increased around the B5044 (Silverdale), A525 (Keele Road) and A53. It should be noted that the NSMM model is developed within the CUBE modelling software application. A limitation of the CUBE software is that it does not model blocking back (traffic queuing back to previous road links with potential to impact other links and junctions). Therefore, there is the possibility of additional related impacts to queuing traffic on Keele Road, for example to the Keele University roundabout."*

SWECO (July 2024) Strategic Transport Assessment

The report recommends mitigations at Keele:

*"A new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525.*

*A new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road."*

*The report notes the impact of these mitigation measures:*

*For Keele, the mitigation measure of a new link road added between the University and Whitmore Road is seen to have a positive impact on the reduction of traffic on Keele Road between the University Roundabout and Gallowstree Lane.*

*It can be seen that during the AM period, westbound traffic is most improved whilst in the PM period, eastbound traffic is most improved. This is likely to be of significant improvement for University traffic and related bus services.*

*It can also be seen that the mitigation brings volume back or nearly back to capacity for each direction and period. There is potential for additional improvements to be made with high impact travel plans and other local bus service improvements."*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes that this report only mitigates the impact of the proposed developments, and in doing so "brings volume back or nearly back to capacity for each direction and period". The Labour group has significant concerns that the mitigation measures proposed in the report are not sufficient to provide long-term sustainable traffic flow in the area.

The report recommends the following mitigations at Audley:

*"Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour."*

SWECO (July 2024) Strategic Transport Assessment

The report recommends the following mitigation measures in Talke:

*"Extension of the NW-bound Newcastle Road two-lane approach to the signalised junction at Newcastle Road/Coalpit Hill. This will give additional space for right-turning traffic that is leading to junction delay issues in scenario 2 – core local plan sites.*

*Cedar Avenue – Community improvements to Cedar Avenue to increase attractiveness of walking, wheeling, and cycling (not able to model in the strategic NSMM transport model)."*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes the Local plan has identified mitigation measures at Keele and Talke:

*"13. Transport infrastructure identified through the Strategic Transport Assessment will be supported.*

*This is to include: - a. a link road between A525 Keele Road and Whitmore Road. b. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)"*

SWECO (July 2024) Strategic Transport Assessment

Labour group notes that funding for these mitigation measures will be identified via 106 funding levied on developments in the area. The Labour group has significant concerns that mitigating the impact of these developments will require 106 funding, and that given the impact of rising cost of living, several developments have proceeded following waiver of the 106 funding requirements. We note within the councils own Infrastructure Baseline Report the following:

*"At the same time, it is critical that any infrastructure expectations do not disincentivise development to such an extent that it becomes unviable, thus inhibiting Newcastle-under-Lyme's growth opportunities. This challenge is particularly acute in those parts of Newcastle-under-Lyme where land and property values are low and profit margins on development are small or even non-existent. In some parts of the Borough, the private sector will not be able to meet all of the infrastructure/policy requirements which are ultimately set out in the Local Plan. In such cases, an appropriate balance will need to be struck between competing interests and demands."*

NBC (July 2024) Infrastructure Baseline Report

The Labour group also notes the Strategic Transport Assessment provided by the SWECO report does not include assessment of the impact of public transport, outside of assumed reductions in car usage.

The borough of Newcastle-under-Lyme, like many other post-industrial non-metropolitan districts, can be considered as a deprived public transport area. Within the borough, public transport is provided via the bus network, and thus subject to the impact of increased traffic and lack of mitigation. At present, travel from Newcastle to connecting rail network stations at Stoke is a 40-minute bus journey outside of periods of high traffic congestion, with a 1 hour journey to Crewe. The Labour group has concerns that the local plan, whilst referring to increased walking and cycling, has no reference to improving the outdated, inefficient, and poor provision of existing public transport across the borough.

**Labour group proposal**

The Labour group wants to see the local plan have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of our communities. That such integrated transport plan involves the combining of different modes of transport to maximise ease and efficiency for the user in terms of time, cost, comfort, safety, accessibility and convenience. We are aware that the cuts to bus routes and times across the borough are leading to difficulties in accessing employment, education and health services. We also know that lack of connectivity leads to social isolation. The Labour group expects to see how the borough plans to address the needs of residents within the borough, demonstrate how it supports the proposed growth in development and population in the plan by working with bus operators, planners and other local authorities such as Staffordshire County Council and Stoke on Trent City Council to get Newcastle moving and growing.

### **Education**

The Borough of Newcastle is divided into two distinct areas for the purpose of school place planning: 1) Newcastle and 2) Kidsgrove. These areas are further broken down into smaller planning areas, which are used to determine the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools and by analysing pupil movement between schools and catchment areas.

A two-tier education system, consisting of Primary (ages 4-11) and Secondary (ages 11-16/18) schools, operates across the Borough. Sixth form provision is available on-site at two secondary schools within the district and is mainly accessible at Newcastle College, with The King's Church of England School, Kidsgrove, also providing this provision. As of September 2020, Newcastle has 30 primary schools, 1 infant school, 1 junior school, and 7 secondary schools, while Kidsgrove has 9 primary schools and 2 secondary schools.

The Infrastructure Baseline Report provided by the Council within the local plan evidence base identifies most areas of the borough have existing capacity within local primary schools to satisfy the proposed developments within the local plan. It is noted however that Newcastle region 5 covering the villages of Silverdale and Knutton would have insufficient school places for the proposed developments on the former municipal golf course.

In the infrastructure delivery plan, the local plan proposes the development of a new primary school on the former municipal golf course:

"The relatively large amount of development set out in the plan for the Keele University corridor (with the inclusion of development site SP11) means there is an identified need for a new 1 Form of Entry (FE) primary school."

#### **Infrastructure delivery plan**

The Labour group notes that the infrastructure baseline report does not include St John's primary school in Keele in meeting the numbers required by this development. Evidence from the school demonstrates the high number of pupils registered at the school from the villages of Silverdale and Knutton. Further, concerns have been raised by members of the governing bodies of the four existing catchment primary schools; St Johns Keele, St Luke's Silverdale, The Racecourse Silverdale and St Mary's Knutton regarding the impact of a new primary school on pupil numbers. More alarmingly, neither Staffordshire County Council, nor the Borough council have communicated with the existing primary schools, including discussions over expansion. The Labour group notes that the Borough council has held conversations with St Chads Kidsgrove, Sir John Offley Madeley and Baldwins Gate primary schools over expansions to their existing estate to sustain development, and therefore raises concerns over the unequitable approach to the schools in the Keele, Knutton and Silverdale area.

### **Labour group proposal**

The Labour group proposes that the prior to adoption of the local plan, that the Council undertakes a consultation with existing primary schools in the Keele, Knutton and Silverdale area to determine if existing capacity can be increased through expansion of the existing estate.

### **Health & Social Care**

Health services in England are overseen by NHS England, which operates five regional teams to commission healthcare services. NHS Midlands and East support the commissioning of services in the West Midlands in partnership with Clinical Commissioning Groups (CCGs) and Acute Trusts.

Clinical Commissioning Groups, established by the Health and Social Care Act 2012, changed how primary care services are planned. They commission most NHS hospital and community services, including hospital care, rehabilitative care, urgent care, community health services, and mental health and learning disability services.

The six Clinical Commissioning Groups serving Staffordshire and Stoke-on-Trent are:

- Cannock Chase CCG
- East Staffordshire CCG
- North Staffordshire CCG
- South East Staffordshire and Seisdon Peninsula CCG
- Stafford and Surrounds CCG
- Stoke-on-Trent CCG

The focus for health and social care is on prevention and providing care outside hospitals where possible. 'Together We're Better' is the Sustainability and Transformation Partnership (STP) for Staffordshire and Stoke-on-Trent. The Staffordshire and Stoke Sustainability Transformation Plan (2016) identifies key challenges, including:

- High rates of obesity, diabetes, and smoking in certain areas.
- An ageing and growing population driving up demand.
- Frequent A&E attendance and a risk-averse staff culture.
- A notable proportion of patients with common mental health conditions.
- Higher than average urgent care activity at acute trusts due to poor primary and community infrastructure and citizen behaviours.

In January 2019, NHS England published The NHS Long Term Plan (LTP) and the Five-Year Framework for GP contract reform, setting out ambitions for the next ten years to improve patient care, health outcomes, and to deliver more coordinated primary and community care. The Five-Year Framework introduced Primary Care Networks (PCNs) as the foundation of Integrated Care Systems (ICSs).

Now established, PCNs are groups of one or more GP practices serving populations of 30,000 to 50,000 patients, providing a strategic view of primary care delivery and identifying estate requirements. ICSs, set to replace STPs in April 2021, will offer strategic oversight at the regional level, identifying opportunities for integrated working across health and social care partners. By April 2022, ICSs will become statutory bodies.

The infrastructure delivery plan notes the following:

"There are three Primary Care Networks (PCNs) in Newcastle-under-Lyme (Newcastle North, Newcastle Central and Newcastle South PCNs) that serve the residents of Newcastle-under-Lyme. These comprise 17 general practices. Of the practices in Newcastle-under-Lyme, only Silverdale Medical Centre is reported to have surplus capacity to accommodate patients with all other practices reporting insufficient capacity. In summation, there are capacity issues at many locations in Newcastle-under-Lyme with some of this attributed to the level of growth experienced by the borough in recent years and a historic lack of funding for the estate via mechanisms such as the planning system"

Infrastructure delivery plan

The Labour group notes all GP practices, outside of the practice in Silverdale, which must be noted is twinned with the Town Centre practice at Ryecroft, are currently at patient capacity. The Labour group further notes that the only proposal within the Local plan is for a new GP practice on the former Golf course, though we also note that this is a relocation of an existing local practice.

### **Social care**

The Department of Health and Social Care oversees adult social care policy in England, with the Care Quality Commission acting as the independent regulator to ensure care services are safe, effective, compassionate, and high-quality.

In England, adult social care can be publicly or privately funded or provided voluntarily. Local authorities are responsible for publicly funded care and have a legal duty to provide care for those who meet nationally set needs and means tests, either by commissioning or directly delivering services.

Pressures on adult social care budgets have risen in recent years due to increasing demand (from a growing, ageing population with more long-term and multiple health conditions), reduced local government funding, and higher care costs.

Consequently, the adult social care sector is facing growing challenges, including a fragile provider market, increasing unmet needs, more strain on informal carers, reduced investment in prevention, pressure on an already overstretched care workforce, and a diminished capacity to help ease demand on the NHS.

In the infrastructure baseline report the following is noted:

"It should be noted that local demand for care services will vary based on the overall size of the population and specific population care needs, the affordability, quality and location of existing services. This is covered in more detail within Staffordshire County Council's market position statements and associated intelligence documents. Newcastle-under-Lyme currently has significant provision for extra care facilities, residential care homes & nursing homes, but it is anticipated that during the Local Plan period additional units within each of these sectors will be required."

Infrastructure baseline report

The Labour group notes that requirement of additional adult social care facilities during the local plan period. The Labour group further notes the lack of identified development within the local plan to meet the rising demands for adult social care.

### **Labour group proposals**

The Labour group proposes that before adoption of the local plan:

- I. The Council work with Staffordshire County Council to identify suitable portions of developments sites within the local plan to meet the rising demand for adult social care provision.
- II. The council work with Primary care networks to increase GP capacity across the whole of the borough.

### **Strategic Employment Sites – the case against AB2 and the case for Chatterley Valley**

The Labour group is opposed to the proposals for the AB2 employment site in Audley. Taking 80 hectares of land in the rural village of Audley out of the green belt and designating it as high-quality strategic employment site without the evidence base to do so and considering the significant recorded public opposition to the proposal appears to be flawed. The removal of green belt, the increase in traffic, noise and pollution combined with the lack of adequate local infrastructure across the locality is inappropriate, especially so when we already have Chatterley Valley strategic employment site that barely features in the Local Plan at all.

This is quite incredible considering Chatterley Valley has seen £3.5 Million investment from Staffordshire County Council into the site, alongside the £3.7 Million the borough council secured as part of the Kidsgrove Town Deal, and has seen infrastructure, utilities and access upgraded.

The Labour group further notes that under the duty to co-operate the Council did not approach Stoke-on-Trent Council, or Staffordshire County Council overuse of the Chatterley Valley development site in the local plan to meet the need for strategic employment sites. The Labour group is concerned that in the doing so, the Council has not legally satisfied the test within the Localism Act and therefore questions the proposal to meet the need for strategic employment sites through removal of land from the green belt.

### **Labour group proposals**

Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.

Chatterley Valley is positioned near key transport links, making it ideal for a strategic enterprise zone. It lies close to the M6 motorway, the A500 (a key artery linking Stoke-on-Trent and Crewe), and major rail links, offering excellent access to the Northwest, the Midlands, and beyond. This location provides businesses with opportunities to easily transport goods and services across the UK, potentially reducing logistics costs and improving connectivity. The North Staffordshire region, including Newcastle-under-Lyme, has a long industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has



cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services. The creation of a strategic enterprise zone in Chatterley Valley would capitalize on this local expertise, attracting investment and providing job opportunities for the region.

#### **Brownfield Redevelopment Potential**

Chatterley Valley has a significant amount of underutilized and brownfield land, which presents a perfect opportunity for redevelopment without impacting greenfield sites. Developing this area would contribute to urban regeneration, transforming it into a hub for industries like green technology, logistics, or advanced manufacturing. Redeveloping brownfield sites aligns with sustainable development goals, boosting the region's environmental credentials.

#### **Potential for Attracting Investment**

Enterprise zones offer businesses tax incentives, simplified planning, and infrastructure support, all of which would make Chatterley Valley an attractive destination for both national and international investors. By designating it a strategic enterprise zone, the area could attract new companies and startups, as well as encourage the growth of existing businesses. This could significantly boost the local economy, creating jobs and increasing regional prosperity.

Locally, this would support Newcastle-under-Lyme Borough Council's economic plans, which focus on regeneration and business growth. The Labour Group want to see a borough strategy aimed at stimulating economic growth in the Midlands and the North to reduce regional disparities. Chatterley Valley could serve as a platform for innovation and the digital economy. With the rise of Industry 4.0, the area has potential to become a centre for businesses involved in automation, artificial intelligence, and digital services. The location could also foster collaboration with nearby Keele and North Staffordshire Universities, known for its research and innovation. Such collaborations could encourage knowledge transfer and innovation-led business growth.

#### **Sustainability and Green Energy Opportunities**

Given the global focus on sustainability and green energy, Chatterley Valley offers an opportunity for eco-friendly development. The site could house businesses focused on renewable energy, energy-efficient technologies, and sustainability initiatives. This would not only contribute to the Councils net-zero goals but also attract companies prioritising sustainable operations, helping to future-proof the local economy.

#### **Adherence to genuine consultation and due process**

The Council is well aware of the large number of complaints and concerns raised at the first consultation stage of the draft plan (1st November 2021 - 13th December 2021), these were largely but not confined to, complaints around lack of face-to-face briefings, forms not being made available as stated, and technical issues and failures of the on line portal. It was clear at that time that the consultation was targeted at highly competent, computer literate regular laptop users, who could cross reference up to 200 public documents through the portal avenue to answer 37 planning specific questions. The readability of the document was poor and out of line with good practise.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100807/file47158.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf),

Labour Councillors raised concerns that the consultation was too focused on the on-line portal and digital access, which we believed would lead to exclusion for thousands of elderly residents, as well as those who did not or could not afford their own laptops, tablets or computers. We felt this approach was contrary to the community engagement and digital exclusion policies previously agreed by the Council.

The Labour welcomed the fact that these issues were focussed on in the second stage consultation and in the main remedied.

However, the Labour group raised a serious issue at a meeting of full council on 24-07-24, where Council was to approve that the plan be agreed and put forward to regulation 19 stage, that critical evidence based documents were still not available to members of council or the public.

The motion highlighting this failure is attached here:

#### **Labour Group Amendments to the Report Titled; Newcastle-under-Lyme Borough Local Plan 2040 of the 24-07-24**

##### **Background**

The Newcastle Labour group of councillors met on Monday 22nd July to review the agenda for the meeting of full council taking place on 24-07-24. The agenda contained at item 5 - Newcastle-under-Lyme Borough Local Plan 2040. The item contains the paper which asks members and council to approve four recommendations as follows;

*That Council:*

- 1. Approves the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme;*
- 2. Authorises the Service Director (Planning), in consultation with the Strategic Planning Portfolio Holder to make any necessary minor typographical changes and modifications to the Final Draft Newcastle-under-Lyme Borough Local Plan 2040, Sustainability Appraisal and Habitat Regulations Assessment prior to consultation;*
- 3. Subject to the outcome of consultation, and if no matters are raised that materially impact upon the Plan strategy, authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024;*
- 4. Authorises the Service Director (Planning) to write to the appointed Inspector(s) at the start of the examination of the Final Draft Newcastle under-Lyme Borough Local Plan 2040 requesting them, under section 20(7C) of the Planning and Compulsory Purchase Act 2004, to recommend any main modifications necessary to ensure the Plan sound and legally compliant.*

##### **Issues identified**

##### **In relation to recommendation 1**

When the Labour group met on the 22-07-24, some 48 hours before the meeting to consider the recommendations we observed that the following supporting documents (none exhaustive) were not available;

1. Infrastructure Delivery Plan
2. Infrastructure Delivery Schedule
3. Strategic Housing and Employment land availability assessment 2024
4. Site assessments
5. Green Belt Assessment
6. Strategic transport assessment
7. Water cycle study
8. Gypsy and traveller site selection report
9. Duty to co-operate statement of compliance
10. Housing supply and delivery position statement

Clearly, the expectation that members approve a local plan through to the regulation 19 representation period, which is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination, is unreasonable and does not adhere to sound governance of the council.

This is a formal process that requires comments on the soundness and legal compliance of the plan.

Members wish to be in a fully informed position in order to move the plan through its statutory process.

### **In relation to recommendation 3**

Consultation is technically any activity that gives people a voice, in this context it is an exercise to provide local residents, businesses and stakeholders a voice and an opportunity to influence important decisions relating to the Borough's local plan.

Consultation requires listening to local people and learning from affected people before decisions are made or priorities are set.

Councils have a statutory requirement to consult their residents, this is especially true for planning or redevelopments. There are strict rules surrounding how consultations are conducted, and a failure to adhere to this could render the council liable for a judicial review.

It is in this regard that recommendation 3 is manifestly problematic – to agree to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024, without affording council the time and space to review the consultation, in full, and to take account of residents, business and stakeholders views in our plan before submitting to the Secretary of State, does not accord with the fundamental principles of consultation compliance. A failure to demonstrate that council has undertaken meaningful consultation could leave council open to complaints of pre-determination.

The most common failures of local authority plans are due to inconsistencies with National Planning Policy, lack of evidence base and inadequate engagement. The amendments below seek to remedy any possible flaws in the plan and process. It is our view that a failure to do so would open the authority to the risk of litigation, reputational damage, and a loss of trust and confidence by those engaging with the process.

### **Proposed amendments**

Replace recommendation(s) 1 and 3 with the following;

1. Council agrees to bring the final draft plan, and supporting documents to the September 2024 full council meeting seeking councils approval of the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme.
3. Following completion of the consultation, council will meet to receive and consider the responses. If council agrees that no amendments to the plan are required and no matters are raised that materially impact upon the Plan strategy, council authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination at the earliest opportunity.

ENDS

### **Amendment Proposer**

Cllr Dave Jones

### **Amendment Seconder**

Cllr Andrew Fox-Hewitt

In response to this motion highlighting critical failures of due process, the Conservative group voted to dismiss the recommendations and voted to proceed to approve the plan through to regulation 19 stage. The Leader of the Council, Cllr Simon Tagg stated at this meeting that it was not true that documents were unavailable prior to group meetings on the 22nd July,

Subsequently to the council meeting however, a complaint and request under the Freedom of Information Act was made to provide details of when documents were made available. The Council response is here; (Table available in attachment)

As can be seen from the response, a total of 9 documents were in fact unavailable. The Labour Group therefore has serious concerns with the adherence to due process the probity of the Leaders actions in response to these issues being identified.

### **Conclusion**

In summary whilst there is much within the Local Plan the Labour group can support, there are several weaknesses that we feel need to be addressed before the Local Plan can be adopted. These include:

- I. Clear targets and delivery plan to ensure the ever-increasing demand for affordable and social housing is met over the lifetime of this Local plan.
- II. Development of an integrated transport plan, including costings and delivery plan that is not subject solely to 106 contributions.
- III. Work with existing primary schools in Knutton, Silverdale and Keele to explore potential expansion of their existing estate to increase pupil capacity.



	<p>IV. Work with Staffordshire County Council to identify capacity within proposed developments for provision of adult social care facilities.</p> <p>V. Work with Primary Care Networks to identify mechanisms to increase GP capacity across the borough.</p> <p>VI. Work with Staffordshire County Council and Stoke-on-Trent City Council to identify capacity within the Chatterley Valley site to accommodate the need for employment sites.</p> <p>Further, the failure to co-operate on sharing of a major strategic employment site at Chatterley Valley, and concerns raised over the consultation process and availability of essential documents; further questions the plans compliance with the Localism Act.</p>
Q10 File 1	6392590
Attachments	<a href="#">1364354 Cllr David Jones.pdf</a>
Comment ID	NULLP1497
Order	42
Title	Policy HOU1: Affordable Housing
Consultee Family Name	Jones
Consultee Given Name	Cllr David
Q4 Part of document	Policy
Q4 Policy	HOU1
Q6 Details	<p><b>Introduction</b></p> <p>The Labour group on Newcastle-under-Lyme Borough council represents the authority's principal opposition group. The group comprises of 18 of the 44 total council members on the authority. Throughout the local plan process, the Labour group has scrutinised the plan, when afforded opportunity to do so, during scrutiny committee, planning committee and full council. Though several recommendations have been proposed, these have not been taken into account by the administration, and therefore the final version of the plan (at Regulation 19 stage) has not taken account of opposition suggestions. This response outlines several concerns that we feel critical to the success of the plan, and pertinent to the planning inspector during official examination of the plan.</p> <p><b>Overview</b></p> <p>The Labour group acknowledges the significant amount of work put into preparation of the regulation 19 pre-submission draft local plan. The Labour group acknowledges the need for a functional and sustainable local plan to ensure development within the borough is guided towards areas of unmet need, or suitability. We wish to be clear that there are many areas of the proposed plan that we agree with and support. However, there are areas of the plan where we have concerns. Whilst these concerns make up most of our comments, they are presented with due respect to several areas of the plan where we agree. We are committed to getting good value for money on behalf of our residents and delivering economic growth, but also protecting green spaces. Therefore, we are unable to support the plan in its current form, where the plans aspirations are unlikely to be matched by realised commitments. Our specific concerns, and proposals to help alleviate these are as follows:</p> <p><b>Housing Targets</b></p> <p>During Regulation 18 examination of the local plan the Labour group raised concerns over the adoption of a housing target of a minimum of 8,000 dwellings from 2020-40 equating to 400 dwellings per annum. Our objections to this housing target were based on a national minimum housing target calculation of 330 p.a. We further note that the housing and economic needs assessment commissioned by the council models a housing need of 347 p.a.1. In providing evidence for the adopted housing target of 400 dwellings p.a. the council relies on modelling provided by the housing and economic needs assessment update that suggests a forecast job creation of at mid-point between modelling forecasts 207 p.a.1, with a blended approach suggesting 237 p.a.</p> <p>The Labour group notes the concern raised over available modelling data in the Turley Report:</p> <p><i>"These are though becoming dated, with each provider having released new forecasts in the last year which envisage the creation of between 194 and 364 new jobs per annum between 2023 and 2040. Either would represent an improvement on the past trend, with Newcastle-under-Lyme having created only 20 jobs per annum on average since 2009, but the higher forecast – from Cambridge Econometrics – appears particularly optimistic given that it adds 100 jobs per year to its previous forecast, presented in the HENAU. This appears due to an unexplained upgrading of the growth prospects of three sectors that have not actually created any jobs in Newcastle-under-Lyme over the past five years, suggesting a need for caution before assuming that these sectors will indeed create far more jobs than forecast only a year ago."</i></p> <p>Turley (March 2024) Housing and Economic Needs Assessment Update: Newcastle-under-Lyme</p> <p>Based on these job growth forecasts, the report recommends a housing need of 400 dwellings p.a. The Labour group notes that the Regulation 19 Draft Plan identifies a housing need of 400 dwellings p.a. Consistent with this assumed significant growth forecast in jobs p.a., whilst noting that such housing numbers would be dependant on a 1085% increase in job creation p.a. The Labour group has significant concerns that the level of house building will not match job growth, and thus raises objection to the sustainability of these developments.</p> <p><b>Delivering Affordable and Social Housing</b></p> <p>The Regulation 19 Draft Plan does not set specific targets for delivery of affordable or social housing. With no clear target on delivery, the Labour group has significant concerns that over the lifetime of the plan limited development of these much-needed dwellings will occur.</p> <p>The Turley report identifies a calculated need of 278 affordable homes p.a. Whilst challenged on this number, the report does highlight the growing demand on the housing register but assumes that this</p>

growth will be met through rising earnings and private sector offerings. The Labour group challenges this assertion, given that wage growth has vastly tracked behind house price, and average rental costs, growth; and that mortgage affordability has been impacted by a significant rise in the Bank of England base rates. The Labour group has concerns that such assumptions will lead to an under-delivery of affordable homes.

The Regulation 19 Draft Plan recommends a number of policies for delivery of affordable and social housing. These are formed under Policy HOU1 Affordable Housing and include:

*"On-site affordable housing provision will be required on sites of 10 dwellings or more, or sites of 0.5ha or more at the following percentages:*

*a. 30% of all units on greenfield sites.*

*b. 15% of all units on brownfield sites within the 'low value zone' as shown on the policies map.*

*c. 25% of units on brownfield sites within the 'high value zone' as shown on the policies map."*

*"Given the acute need for social rented accommodation, the HNA Update (2024) recommends the tenure split of affordable homes to be 65% social rented, 10% other affordable housing product and 25% affordable home ownership through First Homes. Opportunities should also be taken to include a proportion of affordable older persons accommodation as part of the affordable housing provision, particularly involving care provision. Planning permission may be granted for an alternative tenure split provided that robust evidence demonstrates that a different split is more suitable. This will be informed by market conditions and local housing need at the time"*

Unfortunately, at the time of writing we have not been able to locate within the Policies Map document any reference to distribution of sites across 'low vale' and 'high value' zones. However, on the assumption that delivery across non-greenfield sites will amount to 20% of dwellings in developments of 10 dwellings or more, or 0.5ha in size. On this assumption of the 400 dwellings-built p.a. only 80 p.a will be affordable or social housing. This is dramatically below the number of affordable of social rent dwellings needed. Whilst the plan mentions delivering affordable housing, the Labour Group finds no tangible commitments that provide reassurance of its delivery. Current housing policy has largely failed to produce affordable housing due to systemic issues affecting supply, demand, and financing. The introduction of 'Right to Buy' has seen local authorities struggle to replace housing stock, while lengthy approval processes, excessive regulations, and permitting delays have hindered new builds. Rising construction costs, driven by increased material prices, labour shortages, and supply chain issues, have pushed developers towards high-end housing. Limited government support, insufficient subsidies, and poorly targeted incentives have compounded the problem, with the previous government (2010-2024) failing to allocate adequate funding or attract developers. Housing is increasingly treated as an investment asset, with speculative bubbles inflating prices and reducing affordability. Ineffective policies, such as underfunded public housing and rent controls, exacerbate these challenges. In areas like Newcastle-under-Lyme and wider North Staffordshire, wages lag behind housing costs, leading to an affordability gap. Existing rental assistance schemes are often inadequate, failing to cover the full rent cost, and there is a failure to address the needs of the homeless and vulnerable populations, leaving affordable housing out of reach for those who need it most.

The Labour group believes the policies within the Regulation 19 Local Plan will not lead to the delivery of 278 affordable homes p.a. That whilst the commitment to secure between 15-30% of dwellings as affordable homes is a good first step. To meet the demand required, the policy would need to see 70% of new developments as affordable or socially rented. Whilst the Labour group accepts that this percentage would potentially deter developers, we have significant concern that the current 15-30% range will not be met. Rising construction costs has seen a significant number of developments across the borough seek to vary their social housing contributions under 106 agreements. This has led to significant under delivery of these much-needed homes across the borough. The Labour group proposes a recommendation to improve the deliverability of affordable and social housing.

#### **Labour group proposal**

That for developments on public owned land, the minimum percentage of dwellings allocated for affordable and social rented homes is increased to 50%. Given that several large housing developments will occur on either Borough or County Council owned land, and increased allocation in these areas, where land purchase is not necessary will address significant shortfall between anticipated built and need.

Further, whilst outside of the material considerations for the local plan, the Labour group proposes that the Council explore alternative options for delivery of affordable and social housing, including the reintroduction of council stock should delivery continue to be deficient.

The Council generally works with housing developers and other stakeholders to facilitate affordable housing projects – but these have not and will not meet the demand or provide the foundations required for the next twenty years. The argument for our council returning to build council houses revolves around several key points, emphasising the need for more affordable housing, the limitations of private market solutions, and the role of public investment in addressing the housing crisis.

If council builds and retains its housing stock, we create long-term assets that generate rental income and remain under public control. This is a sustainable approach to housing provision, as opposed to relying solely on private developers who may prioritise short-term profit over community needs.

Our proposal to return to council housebuilding is seen by our group as a crucial solution to the affordable housing crisis. By taking control of housing supply, council can directly address the needs of vulnerable residents, provide stability, and counter the failures of market-driven housing policies. Investing in council housing is also a long-term, sustainable approach that can contribute to the overall health and well-being of communities within the Borough.

#### **Transport**

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

Bus services connect the main towns in Staffordshire & Stoke-on-Trent and provide cross boundary links with neighbouring authorities and towns. Whilst bus services have declined in recent years, they continue

to provide vital connections between people, services and places of work and enable people to make more sustainable travel choices.

Staffordshire & Stoke-on-Trent's bus network is operated by several private operators including Arriva Midlands, First Potteries (operating 70% of services in Stoke-on-Trent), D & G, and National Express West Midlands who are significantly increasing their presence in the county. Diamond Bus, Stagecoach and Select Buses also operate services on selected routes.

Key public transport issues include congestion and unreliable journey times, limited frequency of services and falling bus patronage levels affecting commercial viability. To reduce per capita road transport emissions, Staffordshire County Council wish to improve walking, cycling and bus facilities, and are promoting their use to encourage a modal shift away from car use.

Rail connectivity in Staffordshire is currently delivered through a comprehensive rail network and several different franchises. The West Coast Main Line is 700 miles in length from London Euston to Glasgow via Birmingham providing fast services from several Staffordshire stations to London. It is one of the busiest freight routes in Europe and part of the Trans-European Transport Network (TEN-T) route, carrying 40% of all UK rail freight traffic. There are at least 14 train operator companies using this line. Cross Country operate services from the South Coast, Reading, and Birmingham to Manchester calling at Stafford and Stoke-on-Trent. The Crewe to Derby Line which runs via Stoke-on-Trent and Uttoxeter currently suffers from overcrowding.

The local plan makes no proposals to address these issues other than a reference to:

*High Speed Two (HS2) services will pass through Staffordshire when Phase 1 is operational. HS2 services will stop at Stafford Station and will improve journey times and connectivity to London and Birmingham. Phase 2b will provide further improvements in journey times and capacity from Stafford to London, Birmingham and the North West, while 27 releasing capacity on West Coast Main Line services for other Staffordshire & Stoke-on Trent stations."*

Since the publication of the draft plan the HS2 project has been scrapped by the previous Conservative government.

*"The need for a link between the M54 and the M6 was identified in the 2014 Road Investment Strategy (RIS) to relieve congestion on the A460, A449 and A5. The preferred option was announced in 2018 (and a planning application submitted in 2020) which includes a dual carriageway link between M54 J1 and M6 J11 and associated improvements. 6.9. The Midlands Connect studies for the A50 / A500 and A5 have already begun to consider how congestion issues can be addressed and growth supported along these key corridors. The case for investment and opportunities to deliver transport interventions to accelerate growth in the region are being explored. This will lead to preferred investment priorities along these routes which will likely need to be delivered to fully realise the growth potential of Staffordshire & Stoke-on-Trent."*

No further announcements on this road infrastructure have been announced.

Critically however, there is no mention of improved transport links to the Town centre or the Royal Stoke Hospital or the new planned Integrated Care Hub at Bradwell or a plan to improve connection to the rural areas of the borough.

As part of the evidence base for the local plan the Council commissioned a Strategic Transport Assessment by Sweco UK Limited. The SWECO report outlines the existing pressures on the highways network throughout the borough, including the following locations:

- *Slow moving traffic observed in and around Newcastle-under-Lyme centre,*
- *Some limited speed reductions in southern areas of Newcastle-under-Lyme Borough, Madeley and Audley,*
- *Slow moving traffic on the A34 Newcastle Road from the A500 to north of Clough Hall Drive though largely no queuing. Some traffic congestion on signalised roundabout"*

SWECO (July 2024) Strategic Transport Assessment

The draft local plan makes no reference to these existing pressures, nor does it provide any solutions to these pressures.

The SWECO report also notes the existing pressures on links to the strategic road network, notably the M6 and A500.

*"• M16 J16 - Observed data shows traffic congestion along the A500 eastbound approach with decreased speeds (0-10mph AM, 10-0mph PM)*

- *M6 J15 - The speed data indicates that queued traffic (speed 1-10mph) is observed along the A500 approach to the A500 Queensway\ Newcastle Road roundabout in the PM peak,*
- *A500\Alsager Road – Can be inferred from data to be operating without any capacity related congestion,*
- *Talke Interchange - Some relatively slow-moving traffic, along the section between the Newcastle Road\Talke Road roundabout. However, the data indicates that this is slow moving traffic, but in general the data does not show any large reductions in speed due to queuing,*
- *A500/A527 - Data indicates that traffic is operating without the presence of queues long term queues during the peak hour,*
- *A500/A34 -In the AM peak observed speeds of around 20-30mph are in line with the speed limits in place on the A34. This is with the exception of the A34 northbound approach to the gyratory which shows lower observed speeds of around 10-20mph. In the PM peak lower speeds of 10-20mph are also observed on the southbound approach to the gyratory."*

SWECO (July 2024) Strategic Transport Assessment

Again, there are no proposals within the local plan to address these existing pressures on connectivity to the wider strategic road network.

The SWECO report modelled the impact of housing and strategic site developments on traffic flow and made the following conclusions.

Keele:

*"It can be seen that there is a further worsening from the core-only scenario with now severe congestion forecast in both directions of Keele Road between the University and Gallowstree Lane roundabout. Evidence of re-routing is seen with increases in V/C forecast for Mill Street in Silverdale. Moderate*

junction delay issues begin to become apparent at the signalised junction of Cemetery Road/Church Lane/B5044. These patterns are also visible in the difference plots (Figure 8-15 and Figure 8-16) where volume has increased around the B5044 (Silverdale), A525 (Keele Road) and A53. It should be noted that the NSMM model is developed within the CUBE modelling software application. A limitation of the CUBE software is that it does not model blocking back (traffic queuing back to previous road links with potential to impact other links and junctions). Therefore, there is the possibility of additional related impacts to queuing traffic on Keele Road, for example to the Keele University roundabout.”  
SWECO (July 2024) Strategic Transport Assessment

The report recommends mitigations at Keele:

*“A new link road running between University Avenue/Barkers Wood Road to Whitmore Road. The link road will be a 30mph 7.3m wide road connecting the A525 with the A53 to provide an additional route to distribute trips and relieve pressure on the A525.*

*A new circular bus service serving Newcastle-under-Lyme bus station, Keele University, KL15, KL13, TB19, and SP11 sites via Keele Road, the new link road and Whitmore Road.”*

*The report notes the impact of these mitigation measures:*

*For Keele, the mitigation measure of a new link road added between the University and Whitmore Road is seen to have a positive impact on the reduction of traffic on Keele Road between the University Roundabout and Gallowstree Lane.*

*It can be seen that during the AM period, westbound traffic is most improved whilst in the PM period, eastbound traffic is most improved. This is likely to be of significant improvement for University traffic and related bus services.*

*It can also be seen that the mitigation brings volume back or nearly back to capacity for each direction and period. There is potential for additional improvements to be made with high impact travel plans and other local bus service improvements.”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes that this report only mitigates the impact of the proposed developments, and in doing so “brings volume back or nearly back to capacity for each direction and period”. The Labour group has significant concerns that the mitigation measures proposed in the report are not sufficient to provide long-term sustainable traffic flow in the area.

The report recommends the following mitigations at Audley:

*“Bus provision connecting employees within Stoke-on-Trent, Newcastle-under-Lyme and Crewe with AB2 employment. It is assumed the service is timed to meet the needs of any shift patterns and enable some connection with other existing public transport services. This is expected to be a replacement for 10% of car trips originating in nearby zones that could use this and other existing public transport services to access AB2 within 1 hour.”*

SWECO (July 2024) Strategic Transport Assessment

The report recommends the following mitigation measures in Talke:

*“Extension of the NW-bound Newcastle Road two-lane approach to the signalised junction at Newcastle Road/Coalpit Hill. This will give additional space for right-turning traffic that is leading to junction delay issues in scenario 2 – core local plan sites.*

*Cedar Avenue – Community improvements to Cedar Avenue to increase attractiveness of walking, wheeling, and cycling (not able to model in the strategic NSMM transport model).”*

SWECO (July 2024) Strategic Transport Assessment

The Labour group notes the Local plan has identified mitigation measures at Keele and Talke:

*“13. Transport infrastructure identified through the Strategic Transport Assessment will be supported. This is to include: - a. a link road between A525 Keele Road and Whitmore Road. b. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)”*

SWECO (July 2024) Strategic Transport Assessment

Labour group notes that funding for these mitigation measures will be identified via 106 funding levied on developments in the area. The Labour group has significant concerns that mitigating the impact of these developments will require 106 funding, and that given the impact of rising cost of living, several developments have proceeded following waiver of the 106 funding requirements. We note within the councils own Infrastructure Baseline Report the following:

*“At the same time, it is critical that any infrastructure expectations do not disincentivise development to such an extent that it becomes unviable, thus inhibiting Newcastle-under-Lyme’s growth opportunities. This challenge is particularly acute in those parts of Newcastle-under-Lyme where land and property values are low and profit margins on development are small or even non-existent. In some parts of the Borough, the private sector will not be able to meet all of the infrastructure/policy requirements which are ultimately set out in the Local Plan. In such cases, an appropriate balance will need to be struck between competing interests and demands.”*

NBC (July 2024) Infrastructure Baseline Report

The Labour group also notes the Strategic Transport Assessment provided by the SWECO report does not include assessment of the impact of public transport, outside of assumed reductions in car usage. The borough of Newcastle-under-Lyme, like many other post-industrial non-metropolitan districts, can be considered as a deprived public transport area. Within the borough, public transport is provided via the bus network, and thus subject to the impact of increased traffic and lack of mitigation. At present, travel from Newcastle to connecting rail network stations at Stoke is a 40-minute bus journey outside of periods of high traffic congestion, with a 1 hour journey to Crewe. The Labour group has concerns that the local plan, whilst referring to increased walking and cycling, has no reference to improving the outdated, inefficient, and poor provision of existing public transport across the borough.

#### **Labour group proposal**

The Labour group wants to see the local plan have firm detailed and costed plans for a fully integrated transport plan that serves the current and proposed needs of our communities. That such integrated transport plan involves the combining of different modes of transport to maximise ease and efficiency for the user in terms of time, cost, comfort, safety, accessibility and convenience. We are aware that the cuts to bus routes and times across the borough are leading to difficulties in accessing employment, education and health services. We also know that lack of connectivity leads to social isolation.



The Labour group expects to see how the borough plans to address the needs of residents within the borough, demonstrate how it supports the proposed growth in development and population in the plan by working with bus operators, planners and other local authorities such as Staffordshire County Council and Stoke on Trent City Council to get Newcastle moving and growing.

### **Education**

The Borough of Newcastle is divided into two distinct areas for the purpose of school place planning: 1) Newcastle and 2) Kidsgrove. These areas are further broken down into smaller planning areas, which are used to determine the number of school places required. These smaller planning areas have been grouped based on the geographical location of schools and by analysing pupil movement between schools and catchment areas.

A two-tier education system, consisting of Primary (ages 4-11) and Secondary (ages 11-16/18) schools, operates across the Borough. Sixth form provision is available on-site at two secondary schools within the district and is mainly accessible at Newcastle College, with The King's Church of England School, Kidsgrove, also providing this provision. As of September 2020, Newcastle has 30 primary schools, 1 infant school, 1 junior school, and 7 secondary schools, while Kidsgrove has 9 primary schools and 2 secondary schools.

The Infrastructure Baseline Report provided by the Council within the local plan evidence base identifies most areas of the borough have existing capacity within local primary schools to satisfy the proposed developments within the local plan. It is noted however that Newcastle region 5 covering the villages of Silverdale and Knutton would have insufficient school places for the proposed developments on the former municipal golf course.

In the infrastructure delivery plan, the local plan proposes the development of a new primary school on the former municipal golf course:

"The relatively large amount of development set out in the plan for the Keele University corridor (with the inclusion of development site SP11) means there is an identified need for a new 1 Form of Entry (FE) primary school."

Infrastructure delivery plan

The Labour group notes that the infrastructure baseline report does not include St John's primary school in Keele in meeting the numbers required by this development. Evidence from the school demonstrates the high number of pupils registered at the school from the villages of Silverdale and Knutton. Further, concerns have been raised by members of the governing bodies of the four existing catchment primary schools; St Johns Keele, St Luke's Silverdale, The Racecourse Silverdale and St Mary's Knutton regarding the impact of a new primary school on pupil numbers. More alarmingly, neither Staffordshire County Council, nor the Borough council have communicated with the existing primary schools, including discussions over expansion. The Labour group notes that the Borough council has held conversations with St Chads Kidsgrove, Sir John Offley Madeley and Baldwins Gate primary schools over expansions to their existing estate to sustain development, and therefore raises concerns over the unequitable approach to the schools in the Keele, Knutton and Silverdale area.

### **Labour group proposal**

The Labour group proposes that the prior to adoption of the local plan, that the Council undertakes a consultation with existing primary schools in the Keele, Knutton and Silverdale area to determine if existing capacity can be increased through expansion of the existing estate.

### **Health & Social Care**

Health services in England are overseen by NHS England, which operates five regional teams to commission healthcare services. NHS Midlands and East support the commissioning of services in the West Midlands in partnership with Clinical Commissioning Groups (CCGs) and Acute Trusts. Clinical Commissioning Groups, established by the Health and Social Care Act 2012, changed how primary care services are planned. They commission most NHS hospital and community services, including hospital care, rehabilitative care, urgent care, community health services, and mental health and learning disability services.

The six Clinical Commissioning Groups serving Staffordshire and Stoke-on-Trent are:

- Cannock Chase CCG
- East Staffordshire CCG
- North Staffordshire CCG
- South East Staffordshire and Seisdon Peninsula CCG
- Stafford and Surrounds CCG
- Stoke-on-Trent CCG

The focus for health and social care is on prevention and providing care outside hospitals where possible. 'Together We're Better' is the Sustainability and Transformation Partnership (STP) for Staffordshire and Stoke-on-Trent. The Staffordshire and Stoke Sustainability Transformation Plan (2016) identifies key challenges, including:

- High rates of obesity, diabetes, and smoking in certain areas.
- An ageing and growing population driving up demand.
- Frequent A&E attendance and a risk-averse staff culture.
- A notable proportion of patients with common mental health conditions.
- Higher than average urgent care activity at acute trusts due to poor primary and community infrastructure and citizen behaviours.

In January 2019, NHS England published The NHS Long Term Plan (LTP) and the Five-Year Framework for GP contract reform, setting out ambitions for the next ten years to improve patient care, health outcomes, and to deliver more coordinated primary and community care. The Five-Year Framework introduced Primary Care Networks (PCNs) as the foundation of Integrated Care Systems (ICSs).

Now established, PCNs are groups of one or more GP practices serving populations of 30,000 to 50,000 patients, providing a strategic view of primary care delivery and identifying estate requirements. ICSs, set to replace STPs in April 2021, will offer strategic oversight at the regional level, identifying opportunities for integrated working across health and social care partners. By April 2022, ICSs will become statutory bodies.

The infrastructure delivery plan notes the following:

“There are three Primary Care Networks (PCNs) in Newcastle-under-Lyme (Newcastle North, Newcastle Central and Newcastle South PCNs) that serve the residents of Newcastle-under-Lyme. These comprise 17 general practices. Of the practices in Newcastle-under-Lyme, only Silverdale Medical Centre is reported to have surplus capacity to accommodate patients with all other practices reporting insufficient capacity. In summation, there are capacity issues at many locations in Newcastle-under-Lyme with some of this attributed to the level of growth experienced by the borough in recent years and a historic lack of funding for the estate via mechanisms such as the planning system”

#### Infrastructure delivery plan

The Labour group notes all GP practices, outside of the practice in Silverdale, which must be noted is twinned with the Town Centre practice at Ryecroft, are currently at patient capacity. The Labour group further notes that the only proposal within the Local plan is for a new GP practice on the former Golf course, though we also note that this is a relocation of an existing local practice.

#### Social care

The Department of Health and Social Care oversees adult social care policy in England, with the Care Quality Commission acting as the independent regulator to ensure care services are safe, effective, compassionate, and high-quality.

In England, adult social care can be publicly or privately funded or provided voluntarily. Local authorities are responsible for publicly funded care and have a legal duty to provide care for those who meet nationally set needs and means tests, either by commissioning or directly delivering services.

Pressures on adult social care budgets have risen in recent years due to increasing demand (from a growing, ageing population with more long-term and multiple health conditions), reduced local government funding, and higher care costs.

Consequently, the adult social care sector is facing growing challenges, including a fragile provider market, increasing unmet needs, more strain on informal carers, reduced investment in prevention, pressure on an already overstretched care workforce, and a diminished capacity to help ease demand on the NHS.

In the infrastructure baseline report the following is noted:

“It should be noted that local demand for care services will vary based on the overall size of the population and specific population care needs, the affordability, quality and location of existing services. This is covered in more detail within Staffordshire County Council's market position statements and associated intelligence documents. Newcastle-under-Lyme currently has significant provision for extra care facilities, residential care homes & nursing homes, but it is anticipated that during the Local Plan period additional units within each of these sectors will be required.”

#### Infrastructure baseline report

The Labour group notes that requirement of additional adult social care facilities during the local plan period. The Labour group further notes the lack of identified development within the local plan to meet the rising demands for adult social care.

#### Labour group proposals

The Labour group proposes that before adoption of the local plan:

I. The Council work with Staffordshire County Council to identify suitable portions of developments sites within the local plan to meet the rising demand for adult social care provision.

II. The council work with Primary care networks to increase GP capacity across the whole of the borough.

#### Strategic Employment Sites – the case against AB2 and the case for Chatterley Valley

The Labour group is opposed to the proposals for the AB2 employment site in Audley. Taking 80 hectares of land in the rural village of Audley out of the green belt and designating it as high-quality strategic employment site without the evidence base to do so and considering the significant recorded public opposition to the proposal appears to be flawed. The removal of green belt, the increase in traffic, noise and pollution combined with the lack of adequate local infrastructure across the locality is inappropriate, especially so when we already have Chatterley Valley strategic employment site that barely features in the Local Plan at all.

This is quite incredible considering Chatterley Valley has seen £3.5 Million investment from Staffordshire County Council into the site, alongside the £3.7 Million the borough council secured as part of the Kidsgrove Town Deal, and has seen infrastructure, utilities and access upgraded.

The Labour group further notes that under the duty to co-operate the Council did not approach Stoke-on-Trent Council, or Staffordshire County Council overuse of the Chatterley Valley development site in the local plan to meet the need for strategic employment sites. The Labour group is concerned that in the doing so, the Council has not legally satisfied the test within the Localism Act and therefore questions the proposal to meet the need for strategic employment sites through removal of land from the green belt.

#### Labour group proposals

Designating Chatterley Valley as a strategic enterprise zone would bring substantial economic, social, and environmental benefits to Newcastle-under-Lyme. It would unlock the area's potential for attracting investment, creating jobs, and fostering innovation while aligning with national strategies for regional development and sustainability. With its strong transport links and potential for brownfield redevelopment, Chatterley Valley is ideally positioned to become a thriving hub of economic activity.

Chatterley Valley is positioned near key transport links, making it ideal for a strategic enterprise zone. It lies close to the M6 motorway, the A500 (a key artery linking Stoke-on-Trent and Crewe), and major rail links, offering excellent access to the Northwest, the Midlands, and beyond. This location provides businesses with opportunities to easily transport goods and services across the UK, potentially reducing logistics costs and improving connectivity. The North Staffordshire region, including Newcastle-under-Lyme, has a long industrial heritage, particularly in ceramics, manufacturing, and logistics. This history has cultivated a skilled workforce that can readily adapt to new industries such as advanced manufacturing, logistics, and digital services. The creation of a strategic enterprise zone in Chatterley Valley would capitalize on this local expertise, attracting investment and providing job opportunities for the region.

#### Brownfield Redevelopment Potential



Chatterley Valley has a significant amount of underutilized and brownfield land, which presents a perfect opportunity for redevelopment without impacting greenfield sites. Developing this area would contribute to urban regeneration, transforming it into a hub for industries like green technology, logistics, or advanced manufacturing. Redeveloping brownfield sites aligns with sustainable development goals, boosting the region's environmental credentials.

#### **Potential for Attracting Investment**

Enterprise zones offer businesses tax incentives, simplified planning, and infrastructure support, all of which would make Chatterley Valley an attractive destination for both national and international investors. By designating it a strategic enterprise zone, the area could attract new companies and startups, as well as encourage the growth of existing businesses. This could significantly boost the local economy, creating jobs and increasing regional prosperity.

Locally, this would support Newcastle-under-Lyme Borough Council's economic plans, which focus on regeneration and business growth. The Labour Group want to see a borough strategy aimed at stimulating economic growth in the Midlands and the North to reduce regional disparities. Chatterley Valley could serve as a platform for innovation and the digital economy. With the rise of Industry 4.0, the area has potential to become a centre for businesses involved in automation, artificial intelligence, and digital services. The location could also foster collaboration with nearby Keele and North Staffordshire Universities, known for its research and innovation. Such collaborations could encourage knowledge transfer and innovation-led business growth.

#### **Sustainability and Green Energy Opportunities**

Given the global focus on sustainability and green energy, Chatterley Valley offers an opportunity for eco-friendly development. The site could house businesses focused on renewable energy, energy-efficient technologies, and sustainability initiatives. This would not only contribute to the Councils net-zero goals but also attract companies prioritising sustainable operations, helping to future-proof the local economy.

#### **Adherence to genuine consultation and due process**

The Council is well aware of the large number of complaints and concerns raised at the first consultation stage of the draft plan (1st November 2021 - 13th December 2021), these were largely but not confined to, complaints around lack of face-to-face briefings, forms not being made available as stated, and technical issues and failures of the on line portal. It was clear at that time that the consultation was targeted at highly competent, computer literate regular laptop users, who could cross reference up to 200 public documents through the portal avenue to answer 37 planning specific questions. The readability of the document was poor and out of line with good practise.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/100807/file47158.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf),

Labour Councillors raised concerns that the consultation was too focused on the on-line portal and digital access, which we believed would lead to exclusion for thousands of elderly residents, as well as those who did not or could not afford their own laptops, tablets or computers. We felt this approach was contrary to the community engagement and digital exclusion policies previously agreed by the Council.

The Labour welcomed the fact that these issues were focussed on in the second stage consultation and in the main remedied.

However, the Labour group raised a serious issue at a meeting of full council on 24-07-24, where Council was to approve that the plan be agreed and put forward to regulation 19 stage, that critical evidence based documents were still not available to members of council or the public.

The motion highlighting this failure is attached here:

#### **Labour Group Amendments to the Report Titled; Newcastle-under-Lyme Borough Local Plan 2040 of the 24-07-24**

##### **Background**

The Newcastle Labour group of councillors met on Monday 22nd July to review the agenda for the meeting of full council taking place on 24-07-24. The agenda contained at item 5 - Newcastle-under-Lyme Borough Local Plan 2024. The item contains the paper which asks members and council to approve four recommendations as follows;

*That Council:*

- 1. Approves the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme;*
- 2. Authorises the Service Director (Planning), in consultation with the Strategic Planning Portfolio Holder to make any necessary minor typographical changes and modifications to the Final Draft Newcastle-under-Lyme Borough Local Plan 2040, Sustainability Appraisal and Habitat Regulations Assessment prior to consultation;*
- 3. Subject to the outcome of consultation, and if no matters are raised that materially impact upon the Plan strategy, authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024;*
- 4. Authorises the Service Director (Planning) to write to the appointed Inspector(s) at the start of the examination of the Final Draft Newcastle under-Lyme Borough Local Plan 2040 requesting them, under section 20(7C) of the Planning and Compulsory Purchase Act 2004, to recommend any main modifications necessary to ensure the Plan sound and legally compliant.*

##### **Issues identified**

##### **In relation to recommendation 1**

When the Labour group met on the 22-07-24, some 48 hours before the meeting to consider the recommendations we observed that the following supporting documents (none exhaustive) were not available;

1. Infrastructure Delivery Plan
2. Infrastructure Delivery Schedule
3. Strategic Housing and Employment land availability assessment 2024

4. Site assessments
5. Green Belt Assessment
6. Strategic transport assessment
7. Water cycle study
8. Gypsy and traveller site selection report
9. Duty to co-operate statement of compliance
10. Housing supply and delivery position statement

Clearly, the expectation that members approve a local plan through to the regulation 19 representation period, which is the last stage of public engagement before submitting the draft plan to the Inspectorate for examination, is unreasonable and does not adhere to sound governance of the council.

This is a formal process that requires comments on the soundness and legal compliance of the plan. Members wish to be in a fully informed position in order to move the plan through its statutory process.

### **In relation to recommendation 3**

Consultation is technically any activity that gives people a voice, in this context it is an exercise to provide local residents, businesses and stakeholders a voice and an opportunity to influence important decisions relating to the Borough's local plan.

Consultation requires listening to local people and learning from affected people before decisions are made or priorities are set.

Councils have a statutory requirement to consult their residents, this is especially true for planning or redevelopments. There are strict rules surrounding how consultations are conducted, and a failure to adhere to this could render the council liable for a judicial review.

It is in this regard that recommendation 3 is manifestly problematic – to agree to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination by the end of 2024, without affording council the time and space to review the consultation, in full, and to take account of residents, business and stakeholders views in our plan before submitting to the Secretary of State, does not accord with the fundamental principles of consultation compliance. A failure to demonstrate that council has undertaken meaningful consultation could leave council open to complaints of pre-determination.

The most common failures of local authority plans are due to inconsistencies with National Planning Policy, lack of evidence base and inadequate engagement. The amendments below seek to remedy any possible flaws in the plan and process. It is our view that a failure to do so would open the authority to the risk of litigation, reputational damage, and a loss of trust and confidence by those engaging with the process.

### **Proposed amendments**

Replace recommendation(s) 1 and 3 with the following:

1. Council agrees to bring the final draft plan, and supporting documents to the September 2024 full council meeting seeking councils approval of the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 (at Regulation 19 stage), the Sustainability Appraisal, Habitats Regulations Assessment and supporting documentation for public consultation in line with the approved Local Development Scheme.
3. Following completion of the consultation, council will meet to receive and consider the responses. If council agrees that no amendments to the plan are required and no matters are raised that materially impact upon the Plan strategy, council authorises the Deputy Chief Executive in consultation with the Strategic Planning Portfolio Holder to submit the Final Draft Newcastle-under-Lyme Borough Local Plan 2040 and supporting documents to the Secretary of State for formal examination at the earliest opportunity.

ENDS

### **Amendment Proposer**

Cllr Dave Jones

### **Amendment Seconder**

Cllr Andrew Fox-Hewitt

In response to this motion highlighting critical failures of due process, the Conservative group voted to dismiss the recommendations and voted to proceed to approve the plan through to regulation 19 stage. The Leader of the Council, Cllr Simon Tagg stated at this meeting that it was not true that documents were unavailable prior to group meetings on the 22nd July,

Subsequently to the council meeting however, a complaint and request under the Freedom of Information Act was made to provide details of when documents were made available. The Council response is here; (Table available in attachment)

As can be seen from the response, a total of 9 documents were in fact unavailable. The Labour Group therefore has serious concerns with the adherence to due process the probity of the Leaders actions in response to these issues being identified.

### **Conclusion**

In summary whilst there is much within the Local Plan the Labour group can support, there are several weaknesses that we feel need to be addressed before the Local Plan can be adopted. These include:

- I. Clear targets and delivery plan to ensure the ever-increasing demand for affordable and social housing is met over the lifetime of this Local plan.
- II. Development of an integrated transport plan, including costings and delivery plan that is not subject solely to 106 contributions.
- III. Work with existing primary schools in Knutton, Silverdale and Keele to explore potential expansion of their existing estate to increase pupil capacity.
- IV. Work with Staffordshire County Council to identify capacity within proposed developments for provision of adult social care facilities.
- V. Work with Primary Care Networks to identify mechanisms to increase GP capacity across the borough.
- VI. Work with Staffordshire County Council and Stoke-on-Trent City Council to identify capacity within the Chatterley Valley site to accommodate the need for employment sites.

	Further, the failure to co-operate on sharing of a major strategic employment site at Chatterley Valley, and concerns raised over the consultation process and availability of essential documents; further questions the plans compliance with the Localism Act.
<b>Q10 File 1</b>	6392590
<b>Attachments</b>	<a href="#">1364354 Cllr David Jones.pdf</a>

<b>Comment ID</b>	NULLP36
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Tracey
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Comments on the Regulation 19 Draft Local Plan</p> <p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1 LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ul style="list-style-type: none"> <li>• The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> </li> </ol> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council's own evidence document namely, the "Rural Area Topic Paper "(June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <ol style="list-style-type: none"> <li>1 (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.</li> </ol> <ol style="list-style-type: none"> <li>1 LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</li> <li>2 The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</li> </ol>

	<p>3 Policy PSD3: Distribution of Development (page 16)</p> <p>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>1 Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP37
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Jones
<b>Consultee Given Name</b>	Tracey
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	<p>Comments on the Regulation 19 Draft Local Plan</p> <p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <p>1 LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:</p> <ul style="list-style-type: none"> <li>The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>1 (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised</p>

by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.

2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.

1 LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.

1 The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.

1 Policy PSD3: Distribution of Development (page 16)

(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.

(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.

1 Conclusion

6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.

6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.



<b>Comment ID</b>	NULLP698
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>The Council describe at provision 3 of Policy HOU2 that residential development should be of an appropriate type and size, consistent with the most up to date evidence. Our Client objects to any form of specific housing mix requirements being introduced through the Local Plan. It is considered that regard should be had to the conclusions of the evidence base documents, but there should be no specific housing mix imposed on sites, with housing mix instead informed by market conditions and the demand for housing within the marketplace. Housing needs will continue to shift over time, and it is therefore important that the Council's evidence base is continually reviewed and updated (as necessary).</p> <p>Notwithstanding the above, the type and tenure of housing to be provided will need to have regard to any site-specific viability considerations and market demand/conditions at that time of any planning application being submitted; this will ensure a degree of flexibility in how the Policy is applied. This approach should ensure that housing delivery is not delayed as a result.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP685
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p><b>Settlement Hierarchy and Distribution</b></p> <p>The adoption of a clear adoption of a clear settlement hierarchy within the NuLLP is supported, as is the recognition of the role that Rural Centres can play in meeting the development needs of the Borough as a whole. We agree that maintaining the role of the rural centre by securing their ongoing vitality and viability is fundamental to their continuing role as well as the health of their communities and surrounding hinterlands.</p> <p>Jones Homes and Renew Land support draft Policy PSD2: Settlement Hierarchy which seeks to maintain the role and function of Baldwins Gate as a Rural Centre.</p> <p>Policy PSD 2 states, in relation to Rural Centres: "Rural Centres provide a role in service provision to the local population and contain several essential services and facilities in order to meet the day to day</p>

needs of residents. The Rural Centres will meet some of the development needs of the Borough, commensurate with their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character. It is recognised that there are differences between these villages in terms of their sizes and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity. The Rural Centres are Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint). The University Hub is expected to receive a balanced level of growth commensurate with its role as a strategic hub whilst recognising its rural role and function.”

We support the above policy that recognises that there are differences between villages in terms of their sizes and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity.

Draft policy PSD3 seeks therefore to distribute development throughout the settlement hierarchy. The supporting text to PSD3 sets out, however, that the figures presented in this policy are intended as a guide and are neither a ceiling nor a specific target. We consider that whilst figures set out within PSD3 should certainly not be a ceiling, delivery of those number of dwellings is essential to the borough meeting its housing needs as a whole. We consider, therefore that PSD3 should require that the level of development it seeks to distribute should be met as a ‘minimum’.

The resulting Distribution of Development the Rural Centres is set out as follows:

- Audley and Bignall End (joint) in the order of 250 new homes
- Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint) in the order of 250 new homes
- Loggerheads in the order of 450 new homes
- Baldwins Gate in the order of 250 new homes
- Keele and Keele University (joint) in the order of 800 new homes

The Local Plan notes that commitments and completions since the start of the Plan period will contribute towards the indicative targets outlined above and to maintain an available supply of housing land. The broad level of development proposed for those settlements will be delivered through a combination of Local Plan site allocations and through existing housing land supply.

We have fundamental objections to the Local Plan’s approach to the distribution of development to the Rural Centres. We will demonstrate below that the Local Plan does not

have a robust, consistent or transparent methodology for determining the level of growth distributed to each settlement. We conclude that the eventual distribution of growth which has been landed on has been based loosely on a perceived availability of housing land supply at those centres which, again, has not been assessed in a robust, consistent or transparent way. We conclude that the Local Plan, in this regard does not pass any of the tests of soundness set out within the NPPF.

The supporting text to PSD3 at 5.15 of the Local Plan states that the proposed distribution of development for the Borough has been established from: “assessing reasonable alternative options for the distribution of development informed by previous Local Plan consultation stages, the evidence base and Sustainability Appraisal (SA). The process undertaken to establish a development distribution and the consideration of site options is set out in the Plan Strategy Topic Papers, Site Selection Paper and SA Report.”

In the first instance, disappointingly, there is no one source of truth for how the above distribution model has been arrived at or how a methodology has been applied. The closest document to providing an explanation is the Housing Spatial Strategy Topic Paper [ED031] which seeks to show the evolution of the distribution model from the Regulation 18 draft of the Local Plan. Paragraph 5.18 of that document sets out that, at Regulation 18, “Housing site options for these settlements were considered in relation to broad distribution factors, settlement hierarchy and the merits of individual sites through the site selection process.”

For the rural service centres, paragraph 5.86 – 5.88 explains:

In accordance with strategic factors it is appropriate to primarily direct growth to the strategic and urban centres. As part of a balanced distribution of development a proportionate level of growth is also appropriate in the rural service centres commensurate with their role and function including the range of key facilities and infrastructure. The Regulation 18 preferred spatial strategy identified a proportionate quantum of development for the rural service centres that combined with the strategy for the strategic and urban centre provided for LHN.

A site selection process was also undertaken for the rural service centres consistent with the broad distribution factors and settlement hierarchy to direct an appropriate scale of growth to these settlements. Bottom-up considerations and the merits of the sites have then been considered informed by site specific SA, key evidence studies and ongoing stakeholder engagement to identify a shortlist of preferred sites. It is considered that there are no further reasonable alternative growth scenarios for the rural service centres. Scenarios identifying higher levels of growth in these settlements would be inappropriate in relation to broad distribution factors, settlement hierarchy and the availability of key facilities / infrastructure. The most sustainable sites for these

settlements have been identified through the site selection process. It is considered that there are no further reasonable alternative growth scenarios to appraise for these settlements.

In essence then, ED031 sets out that the Reg 18 Local Plan sought to distribute development between the Rural Centres (having decided what the overall level of growth would be) in accordance with the suitability of the rural centre for growth (based on services and facilities).

The Rural Area Topic Paper (RATP) (2024) sets out the methodology for establishing the position of the rural settlements. Table 3 of the RATP sets out the sustainability of settlements and shows that Baldwins Gate and Loggerheads are the only Rural Centres that meet all sustainability criteria for meeting the day to day needs of their populations on their own, without the reliance of being considered alongside a nearby settlement.

Notwithstanding the above, and without any reasonable explanation the Reg 18 Local Plan failed to allocate any development towards Baldwins Gate. Our Representations to the Reg 18 Local Plan consultation (at Appendix 2) set out the reasons that approach was unsound and stressed the importance of providing a proportionate level of growth to the Rural Centres to maintain their vitality and viability.

The Reg 18 Local Plan did set out that a Planning Appeal at Baldwins Gate Farm was due to be determined at Inquiry following the consultation on the Local Plan and that the LPA would revisit its

position on allocating development to Baldwins Gate subject to that appeal. That appeal was subsequently allowed and that site has subsequently been allocated for development.

The failure of the previous local plan to allocate any development towards Baldwins Gate despite it being demonstrated as equally the most sustainable Rural Centre within the borough demonstrates that the conclusions reached by the Local Plan (not to allocate growth) were not reflective of the approach reported to be being taken within the Plan Strategy Topic Paper. Indeed, the approach to Site Selection is completely absent insofar as the only Site which was to be allocated was one which was successful at appeal.

Contrary to paragraph 5.15 of the draft Local Plan, the Sustainability Appraisal (SA), Site Selection Methodology or other parts of the evidence base do not provide any further information as to how the decision has been made to proportion development among the rural centres. The resulting distribution of development does not bear out a logical approach to distribution on any one of, or combination of the factors set out to have been considered within ED031; or if it has, it has not been presented transparently to the reader of the plan or its evidence base.

This lack of evidence based approach is borne out in the disparities between the different Rural Centres and how growth has been distributed amongst them.

Notwithstanding having identical settlement status, and sharing an equivalent number of services and facilities, draft Policy PSD3 seeks to apportion some 450 dwellings to Loggerheads over the plan period in comparison to 250 dwellings at Baldwins Gate. We consider that failing a more robust methodology than the Council has provided, the Local

Plan should be bound to at least a fair and even distribution of development across its sustainable settlements in line with their access to services and facilities; i.e. Baldwins Gate should at least be apportioned 450 homes in line with Loggerheads.

Notwithstanding the lack of methodology for the distribution of growth having been provided within the evidence base for the Local Plan, it can be fairly readily deduced that the eventual quantum of development for each Rural Centre has been arrived at as a result of the number of sites (and their capacity) that the Council considered was available and appropriate to bring forwards. In the case of Baldwins Gate, that is certainly true where the disaggregation of development towards it has only happened as a result of planning permission having been granted at appeal; as made clear by the Reg 18 Local Plan and the Plan Strategy Topic Paper [ED031].

We do not consider it inherently unsound to distribute development across a range of settlements based on, in part, the availability of suitable sites for development. However, if that is the approach that a Local Plan is to take, it must be soundly done and, as such, must be positively prepared, justified, effective and compliant with national policy. Notwithstanding those tests, it must also be done fairly and with transparency such that the reader (including a Local Plan Inspector Examining the Plan) can see and understand the process which has been undertaken.

Such an approach has not been executed in the case of the NuLLP. Putting to one side that the methodology purported within the evidence base (distribution commensurate with the role of the settlement) doesn't reflect the one that has been taken (distribution based on site availability), the approach to Site selection is not considered to be robust or transparent.

The Site Selection Methodology (SSM) Report within the Council's evidence base at paragraph 2.1 sets out the stages to site selection as: The site selection process comprises several stages. There may be instances where sites have had to move between stages on an iterative basis. The stages are: -

Stage 1: establish a pool of sites to consider through the Strategic Housing and Economic Land Availability Assessment (SHELAA)

Stage 2: First site sift using the list of SHELAA to generate a list of sites for further consideration through the process

Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres".

Stage 4: Site Assessment using SA (Sustainability Appraisal), HRA (Habitats Regulations Assessment) and appropriate relevant evidence.

Stage 5: Evaluation and initial recommendations - have enough non-Green Belt sites been identified in the centre to meet the distribution of development. If development needs have not been met through: -

- Allocation of non-greenbelt sites
- Discussions with neighbouring authorities to meet the Borough's need
- There are exceptional circumstances Then consider Green Belt sites for allocation

Stage 6: Public consultation and input from statutory consultees

Stage 7: Final site sift and site selection (our emphasis)

We have no material objection to Stage 1 and Stage 2 of the SSM as a mechanism; we consider that it is appropriate for the SHELAA (informed by the call for sites process) to inform the pool for sites to be considered. Taking Baldwins Gate as an example, some 9 sites were identified in that process in Baldwins Gate and a further 4 within the surrounding area. All were sifted in to Stage 3.

The fundamental objection we have with the SSM is in Stage 3 which, as above, is stated as: "Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres"

In essence, the SSM states that once it has found enough sites to meet the required number of dwellings within a centre, it can take the decision to discontinue the search for sites.

In the case of Baldwins Gate specifically, this is a completely circular argument and self fulfilling. Table 35 of the SSM sets out the summary position for Baldwins Gate that there is a 'target of 250 dwellings' and 49 committed dwellings within the settlement.

At Stage 3 (paragraph 10.1-10.3), it sets out: "10.1. Table 35 (above) highlights that commitments and completions are insufficient to meet the indicative development requirements for Baldwins Gate Therefore, it is necessary to continue with the site selection process.

However, site LW74 (Baldwins Gate Farm, Newcastle Road) has planning permission granted post 31 March 2023 at appeal for 200 dwellings within a community parkland. The appeal decision, alongside planning permissions and completions in Baldwins Gate are considered to be in the order of 250 dwellings."

	<p>The SSM suggest that, co-incidentally, the distribution model has a 201 dwelling deficit which has been filled by development of 200 dwellings won at appeal and therefore, the SSM can end its search for further sites for development. However, as set out above, we know from the previous Reg 18 Local Plan, and the lack of other methodology provided, that the figure of 250 dwellings has been arrived at precisely because there was an appeal decision which allowed 200 dwellings (in addition to 49 dwellings which are existing commitments).</p> <p>As above, this methodology is entirely circular, is not based on a robust methodology and is not plan led.</p> <p>Indeed, as set out below, even if the above circular methodology was applied and development was to be allocated to the Rural Centres based only on the Council's preferred Sites, that selection methodology (for the comparison and selection of sites) must, in itself, be robust. Again, we consider that no such fair and transparent process has been undertaken, particularly with regard to Baldwins Gate.</p> <p>Indeed, as set out within both the SHELAA, the SSM and the Sustainability Appraisal, the land at Baldwins Gate Farm (which has been allocated) does not perform materially differently to other Sites which have been sifted into the SHELAA by the Council's assessment. Indeed, the Council itself refused development for Baldwins Gate Farm. We provide a commentary on that process below.</p> <p>Jones Homes' site has been considered within the Site Selection Report (informed by the SHELAA) under reference LW38. However, this was discounted from consideration for allocation based on "concerns over access arrangements into the site and the loss of agricultural land."</p> <p>In terms of the loss of agricultural land, the Baldwins Gate Farm appeal was allowed despite the site being located on Grade 2 and 3 agricultural land. Jones Homes' site is on exclusively Grade 3 land. Moreover, that Grade 3 land is predominantly 3b land which is not Best and Most Versatile land and prevents the Site as a whole from being farmed as BMV (as demonstrated within the Agricultural Land Classification Report submitted with Jones Homes pending planning applications). Loss of agricultural land should not be seen as a barrier to development.</p> <p>In terms of access concerns expressed, no detail is given as to what these relate to specifically. However, transport assessment work undertaken by Jones Homes in support of the pending planning application has shown that the Site can be accessed safely.</p> <p>Responses from the LHA in relation to the planning application demonstrates the same.</p> <p>Furthermore, the recent appeal decision at Baldwins Gate Farm showed that there is the potential for safe access to be delivered in this part of the settlement based on existing highway capacity. The development of the Jones Homes' site offers the opportunity to provide a more recognisable gateway into the settlement from the west and as such increase highway safety further.</p> <p>As such, not only is the Jones Homes site is an entirely suitable site for allocation within the NuLLP (and would assist in meeting the established spatial strategy of the Plan) we consider it performs equal or better than the Site at Baldwins Gate Farm which was allowed at appeal and other comparison sites assessed within the SHELAA.</p> <p>As such, the site selection methodology needs revisiting in order to accurately assess Jones Homes' site and conclude that it is appropriate for allocation.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reprs.pdf</a>
<b>Comment ID</b>	NULLP689
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council') in August 2024. Please also see attached representations.</p> <p>Policy PSD7 as drafted is considered to be sufficiently aspirational such that it will deliver high-quality design. That said, there remains the need to apply a degree of subjective assessment on a site-by-site basis taking account of local context, character, and surroundings such that each development is capable of being assessed on its own merits. This will also ensure variety in the design of new development</p>

	across the Borough. Should the Council intend to introduce any more prescriptive design guidance (beyond that in Policy PSD7), this should take the form of a Supplementary Planning Document
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP669
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
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<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Site Allcations Omission Site
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council') in August 2024. Please also see attached representations.</p> <p>Land off Woodside</p> <p>As previously stated, the Promoters have a land interest at Woodside, Baldwins Gate. The precise location of the land is shown on the Site Location Plan at Appendix C.</p> <p>The Site lies on the south western edge of Baldwin's Gate within the borough of Newcastleunder-Lyme and extends to approximately 2.5 hectares comprising of pastoral land with the easternmost part including some coppiced woodland.</p> <p>The Site is currently the subject of a pending planning application for 40 homes which was submitted by Jones Homes and validated on 8 March 2023. This is currently pending consideration under reference 22/01105/FUL.</p> <p>In terms of the adopted planning policy, the Site sits outside of the Green Belt. It is allocated as an Area for Landscape Restoration (Policy N21). This policy states that the Council will support, subject to other plan policies, proposals that would regenerate the landscape appropriate to its urban or rural location. Where development can be permitted, developers will be expected to use the opportunity provided by the development to make a positive contribution towards landscape regeneration.</p> <p>The Site is within the Neighbourhood Area of the Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan adopted on 21st January 2020. The Neighbourhood Development Plan does not make any specific allocations or designations in relation to the land. It is worthy of note that the NDP does not make any allocations for residential development within the Plan, nor does it seek to deliver any housing requirement attributed to it through the remainder of the Development Plan.</p> <p>Baldwins Gate</p> <p>Baldwins Gate is proposed to be designated as a Rural Centre in the NuLLP and provides a significant role in meeting the day to day needs of its local population and rural hinterland. It is the largest settlement in Whitmore Parish and has a number of facilities and services available such as a primary school, doctor's surgery, church, butcher's shop and a post office with shop. However, it should be noted that the majority of the Site itself is in Chapel &amp; Hill Chorlton Parish.</p> <p>There is also a bus service (64) linking the village with key local centres such as Shrewsbury, Market Drayton, Newcastle-under-Lyme and Hanley.</p> <p>Relevant Planning History</p> <p>Application reference 22/01105/FUL was validated 8th March 2023 and is pending determination. An online planning history search has also been undertaken, and no other planning applications were found for the application Site, dating back to 1992.</p> <p>The Site directly adjacent to the north of our side has been subject to numerous planning applications for residential development. Planning application 13/00551/OUT for outline planning permission for 4 residential dwellings was approved in 2014 and there have been a number of associated approval of details and subsequent amendments since (those are not repeated here). Development at the Site now appears to be completed.</p> <p>There have been a number of Planning Appeal decisions from the Secretary of State, pertaining to residential development within Baldwins Gate. Those decisions have considered in depth the suitability of the village to accommodate housing development.</p> <p>One of those appeals refers to land to the immediate north of the Site by Richborough Estates (Pins Ref: APP/P3420/W/23/3314808) which was allowed for up to 200 homes at land at Baldwins Gate Farm, Newcastle Road, Baldwins Gate, Newcastle Under Lyme ST5 5ES. The appeal confirmed that Baldwins Gate was a suitable location for development by virtue of a number of existing services and facilities.</p>



	<p>The Inspector identified the village as being reasonably well served in terms of facilities and concluded that the village was a sustainable settlement. They noted that the village contains a range of facilities including a Primary School, petrol filling station, shop, village hall, doctor's surgery and a public house. As such, there is an acceptable level of services available for meeting the majority of day-to-day needs. They noted, however, the village has limited employment and retail opportunities and therefore future occupiers of the proposed development would need to access these in other higher order settlements, such as Market Drayton and Newcastle Under Lyme; albeit this did not undermine the conclusion that Baldwins Gate was a suitable location for development.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP700
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>Our Client recognises national trends in relation to the promotion of custom and self-build housing in seeking to address the housing crisis; indeed, it is now identified within the Framework as a potential source of supply. However, our Client objects to the requirements of this Policy.</p> <p>As drafted, the policy requires major residential schemes to provide a proportion of serviced plots for self build / custom building opportunities. The proportion will be determined by the Council in line with demand identified on the Self and Custom Build Register, unless unviable. Jones Homes is concerned with the lack of transparency in this policy.</p> <p>The Self and Custom Build Register is a crucial source of information for developers and individuals looking to engage in self or custom build projects. Currently, the register is not available for public viewing on the Council's website. If applicants are expected to provide this type of housing to meet policy requirements, they need access to the register at an early stage in the development process. Making this information accessible will allow developers to evaluate demand and incorporate relevant costs into their financial appraisals from the outset, rather than being confronted with unexpected requirements at the preapplication or application stage. This proactive approach would enable better financial planning, improved project feasibility, and a more streamlined development process.</p> <p>To ensure transparency and efficiency, it is recommended that the register be made available online for easy access by all stakeholders, including potential developers, landowners, and community members. Providing visibility early on will not only help inform planning and decision-making but also support the Council's goals of meeting housing needs in a fair and efficient manner.</p> <p>Furthermore, the policy lacks transparency in outlining how requirements for Self Build and Custom Build plots will be implemented, which raises questions about its practicality and effectiveness. The ambiguity leaves developers uncertain about the expectations for each project, as there is no clear indication of whether the Council intends to apply this requirement as a fixed percentage of the total number of proposed units or if it will require a specific number of plots only after a particular threshold is met. For a policy to be sound and enforceable, it must provide unambiguous guidelines on its application. Therefore, the policy should explicitly state whether the Self Build and Custom Build requirement will be calculated as a percentage of the total housing units in a development or whether it will trigger a specific obligation based on a certain development size or threshold (e.g., only for sites with more than 10 units). Without this clarity, developers will struggle to interpret and comply with the policy, potentially leading to delays and disputes.</p> <p>It is recommended that the policy be revised to include a clear methodology that outlines how the requirement will be calculated, when it will be applicable, and what proportion or number of units must be dedicated to Self Build and Custom Build plots. This level of specificity will ensure the policy is applied consistently, making it more predictable and manageable for all parties involved.</p> <p>It would be appropriate for the need / demand for self build / custom build opportunities to be examined in a housing need assessment. This would allow stakeholders to engage with this type of provision in a positive and proactive manner</p>



<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP687
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
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of development informed by previous Local Plan consultation stages, the evidence base and Sustainability Appraisal (SA). The process undertaken to establish a development distribution and the consideration of site options is set out in the Plan Strategy Topic Papers, Site Selection Paper and SA Report.” In the first instance, disappointingly, there is no one source of truth for how the above distribution model has been arrived at or how a methodology has been applied. The closest document to providing an explanation is the Housing Spatial Strategy Topic Paper [ED031] which seeks to show the evolution of the distribution model from the Regulation 18 draft of the Local Plan. Paragraph 5.18 of that document sets out that, at Regulation 18, “Housing site options for these settlements were considered in relation to broad distribution factors, settlement hierarchy and the merits of individual sites through the site selection process.”

For the rural service centres, paragraph 5.86 – 5.88 explains:

In accordance with strategic factors it is appropriate to primarily direct growth to the strategic and urban centres. As part of a balanced distribution of development a proportionate level of growth is also appropriate in the rural service centres commensurate with their role and function including the range of key facilities and infrastructure. The Regulation 18 preferred spatial strategy identified a proportionate quantum of development for the rural service centres that combined with the strategy for the strategic and urban centre provided for LHN.

A site selection process was also undertaken for the rural service centres consistent with the broad distribution factors and settlement hierarchy to direct an appropriate scale of growth to these settlements. Bottom-up considerations and the merits of the sites have then been considered informed by site specific SA, key evidence studies and ongoing stakeholder engagement to identify a shortlist of preferred sites. It is considered that there are no further reasonable alternative growth scenarios for the rural service centres. Scenarios identifying higher levels of growth in these settlements would be inappropriate in relation to broad distribution factors, settlement hierarchy and the availability of key facilities / infrastructure. The most sustainable sites for these

settlements have been identified through the site selection process. It is considered that there are no further reasonable alternative growth scenarios to appraise for these settlements.

In essence then, ED031 sets out that the Reg 18 Local Plan sought to distribute development between the Rural Centres (having decided what the overall level of growth would be) in accordance with the suitability of the rural centre for growth (based on services and facilities).

The Rural Area Topic Paper (RATP) (2024) sets out the methodology for establishing the position of the rural settlements. Table 3 of the RATP sets out the sustainability of settlements and shows that Baldwins Gate and Loggerheads are the only Rural Centres that meet all sustainability criteria for meeting the day to day needs of their populations on their own, without the reliance of being considered alongside a nearby settlement.

Notwithstanding the above, and without any reasonable explanation the Reg 18 Local Plan failed to allocate any development towards Baldwins Gate. Our Representations to the Reg 18 Local Plan consultation (at Appendix 2) set out the reasons that approach was unsound and stressed the importance of providing a proportionate level of growth to the Rural Centres to maintain their vitality and viability. The Reg 18 Local Plan did set out that a Planning Appeal at Baldwins Gate Farm was due to be determined at Inquiry following the consultation on the Local Plan and that the LPA would revisit its position on allocating development to Baldwins Gate subject to that appeal. That appeal was subsequently allowed and that site has subsequently been allocated for development.

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Contrary to paragraph 5.15 of the draft Local Plan, the Sustainability Appraisal (SA), Site Selection Methodology or other parts of the evidence base do not provide any further information as to how the decision has been made to proportion development among the rural centres. The resulting distribution of development does not bear out a logical approach to distribution on any one of, or combination of the factors set out to have been considered within ED031; or if it has, it has not been presented transparently to the reader of the plan or its evidence base.

This lack of evidence based approach is borne out in the disparities between the different Rural Centres and how growth has been distributed amongst them.

Notwithstanding having identical settlement status, and sharing an equivalent number of services and facilities, draft Policy PSD3 seeks to apportion some 450 dwellings to Loggerheads over the plan period in comparison to 250 dwellings at Baldwins Gate. We consider that failing a more robust methodology than the Council has provided, the Local

Plan should be bound to at least a fair and even distribution of development across its sustainable settlements in line with their access to services and facilities; i.e. Baldwins Gate should at least be apportioned 450 homes in line with Loggerheads.

Notwithstanding the lack of methodology for the distribution of growth having been provided within the evidence base for the Local Plan, it can be fairly readily deduced that the eventual quantum of development for each Rural Centre has been arrived at as a result of the number of sites (and their capacity) that the Council considered was available and appropriate to bring forwards. In the case of Baldwins Gate, that is certainly true where the disaggregation of development towards it has only happened as a result of planning permission having been granted at appeal; as made clear by the Reg 18 Local Plan and the Plan Strategy Topic Paper [ED031].

We do not consider it inherently unsound to distribute development across a range of settlements based on, in part, the availability of suitable sites for development. However, if that is the approach that a Local Plan is to take, it must be soundly done and, as such, must be positively prepared, justified, effective and compliant with national policy. Notwithstanding those tests, it must also be done fairly and with transparency such that the reader (including a Local Plan Inspector Examining the Plan) can see and understand the process which has been undertaken.

Such an approach has not been executed in the case of the NuLLP. Putting to one side that the methodology purported within the evidence base (distribution commensurate with the role of the settlement) doesn't reflect the one that has been taken (distribution based on site availability), the approach to Site selection is not considered to be robust or transparent.

The Site Selection Methodology (SSM) Report within the Council's evidence base at paragraph 2.1 sets out the stages to site selection as: The site selection process comprises several stages. There may be instances where sites have had to move between stages on an iterative basis. The stages are: -

Stage 1: establish a pool of sites to consider through the Strategic Housing and Economic Land Availability Assessment (SHELAA)

Stage 2: First site sift using the list of SHELAA to generate a list of sites for further consideration through the process

Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres".

Stage 4: Site Assessment using SA (Sustainability Appraisal), HRA (Habitats Regulations Assessment) and appropriate relevant evidence.

Stage 5: Evaluation and initial recommendations - have enough non-Green Belt sites been identified in the centre to meet the distribution of development. If development needs have not been met through: -

- Allocation of non-greenbelt sites
- Discussions with neighbouring authorities to meet the Borough's need
- There are exceptional circumstances Then consider Green Belt sites for allocation

Stage 6: Public consultation and input from statutory consultees

Stage 7: Final site sift and site selection (our emphasis)

We have no material objection to Stage 1 and Stage 2 of the SSM as a mechanism; we consider that it is appropriate for the SHELAA (informed by the call for sites process) to inform the pool for sites to be considered. Taking Baldwins Gate as an example, some 9 sites were identified in that process in Baldwins Gate and a further 4 within the surrounding area. All were sifted in to Stage 3.

The fundamental objection we have with the SSM is in Stage 3 which, as above, is stated as: "Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres"

In essence, the SSM states that once it has found enough sites to meet the required number of dwellings within a centre, it can take the decision to discontinue the search for sites.

In the case of Baldwins Gate specifically, this is a completely circular argument and self fulfilling. Table 35 of the SSM sets out the summary position for Baldwins Gate that there is a 'target of 250 dwellings' and 49 committed dwellings within the settlement.

At Stage 3 (paragraph 10.1-10.3), it sets out: "10.1. Table 35 (above) highlights that commitments and completions are insufficient to meet the indicative development requirements for Baldwins Gate Therefore, it is necessary to continue with the site selection process.

However, site LW74 (Baldwins Gate Farm, Newcastle Road) has planning permission granted post 31 March 2023 at appeal for 200 dwellings within a community parkland. The appeal decision, alongside planning permissions and completions in Baldwins Gate are considered to be in the order of 250 dwellings."

The SSM suggest that, co-incidentally, the distribution model has a 201 dwelling deficit which has been filled by development of 200 dwellings won at appeal and therefore, the SSM can end its search for further sites for development. However, as set out above, we know from the previous Reg 18 Local Plan, and the lack of other methodology provided, that the figure of 250 dwellings has been arrived at precisely because there was an appeal decision which allowed 200 dwellings (in addition to 49 dwellings which are existing commitments).

As above, this methodology is entirely circular, is not based on a robust methodology and is not plan led.

Indeed, as set out below, even if the above circular methodology was applied and development was to be allocated to the Rural Centres based only on the Council's preferred Sites, that selection methodology (for the comparison and selection of sites) must, in itself, be robust. Again, we consider that no such fair and transparent process has been undertaken, particularly with regard to Baldwins Gate.

Indeed, as set out within both the SHELAA, the SSM and the Sustainability Appraisal, the land at Baldwins Gate Farm (which has been allocated) does not perform materially differently to other Sites which have been sifted into the SHELAA by the Council's assessment. Indeed, the Council itself refused development for Baldwins Gate Farm. We provide a commentary on that process below.

Jones Homes' site has been considered within the Site Selection Report (informed by the SHELAA) under reference LW38. However, this was discounted from consideration for allocation based on "concerns over access arrangements into the site and the loss of agricultural land."

In terms of the loss of agricultural land, the Baldwins Gate Farm appeal was allowed despite the site being located on Grade 2 and 3 agricultural land. Jones Homes' site is on exclusively Grade 3 land. Moreover, that Grade 3 land is predominantly 3b land which is not Best and Most Versatile land and prevents the Site as a whole from being farmed as BMV (as demonstrated within the Agricultural Land Classification Report submitted with Jones Homes pending planning applications). Loss of agricultural land should not be seen as a barrier to development.

In terms of access concerns expressed, no detail is given as to what these relate to specifically. However, transport assessment work undertaken by Jones Homes in support of the pending planning application has shown that the Site can be accessed safely.

Responses from the LHA in relation to the planning application demonstrates the same.

Furthermore, the recent appeal decision at Baldwins Gate Farm showed that there is the potential for safe access to be delivered in this part of the settlement based on existing highway capacity. The development of the Jones Homes' site offers the opportunity to provide a more recognisable gateway into the settlement from the west and as such increase highway safety further.

As such, not only is the Jones Homes site an entirely suitable site for allocation within the NuLLP (and would assist in meeting the established spatial strategy of the Plan) we

	<p>consider it performs equal or better than the Site at Baldwins Gate Farm which was allowed at appeal and other comparison sites assessed within the SHELAA.</p> <p>As such, the site selection methodology needs revisiting in order to accurately assess Jones Homes' site and conclude that it is appropriate for allocation.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP670
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>This section of our representation provides sets our commentary on the NuLLP Regulation 19 draft in terms of NuLBC's housing requirement.</p> <p>Standard Method for calculating housing need</p> <p>The principle of using the Standard Methodology to establish a starting point for the NuLLP is in accordance with national policy set out at paragraph 61 of the NPPF.</p> <p>The Government is clear at paragraph 61 of the NPPF that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using the standard methodology unless exceptional circumstances justify an alternative approach. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</p> <p>The Local Housing Need figure quoted within the draft plan is 347 dwellings per annum (as defined by the Standard Method at the time of writing). If applied over the Council's proposed plan period (2020-2040) this would equates to a total housing need of 6,940 homes.</p> <p>The Housing and Economic Needs Assessment (2024) (HENA) provides an assessment of local housing and employment needs over the plan period (2020-204). To support forecast economic growth and associated increase in the working age population, the HENA identifies a need to deliver approximately 8,000 dwellings (400 dwellings per annum) over the plan period (2020 – 2040).</p> <p>Accordingly, the Draft Local Plan Policy PSD1 sets NUL's proposed housing requirement for the plan period 2020-2040 as a minimum of 8,000 dwellings; or 400 dwellings per annum. This comprises an uplift of 53 dwellings per annum over the LHN figure stated within the Plan.</p> <p>The National Planning Policy Framework (NPPF) supports the delivery of housing above the standard method where this is justified by a local economic growth strategy. We have, in our previous representations to the draft Local Plan supported that uplift.</p> <p>Notwithstanding that previous support, we consider that there are exceptional circumstances which would justify the Council taking an alternative approach to planning for its housing requirement. Those circumstances arise in consideration of the Government's emerging NPPF 2024 and its Written Ministerial Statement (WMS) which accompanied the release of the draft NPPF Proposed Changes to National Planning Policy Framework (NPPF) (2024)</p> <p>The proposed changes to the NPPF were published for consultation until the 24th September 2024. These place a greater emphasis on the delivery of new homes with the overall target raised from 300,000 to around 370,000 homes, a 22% increase against the previous method.</p> <p>To achieve this, the Government has committed to move away from the current standard method of identifying local housing need based on ONS 2014 figures for household projections and replace it with a method that takes as its baseline starting 0.8% of existing housing stock in each local authority area. The currently adopted standard method figure for Newcastle-under-Lyme is 330 new homes per year (rather than the 347 stated within the draft plan) with the proposed revised figure being 593, which is an 80% increase.</p> <p>The proposed implementation of the new NPPF is dealt with in Annex 1 including transitional arrangements for those authorities with emerging development plans. Paragraph 226 of the draft NPPF states that the policies in this Framework will apply for the purpose of preparing local plans from its publication date (+ one month) unless, amongst other scenarios, the emerging annual housing requirement in a local plan</p>



that reaches or has reached Regulation 19 (pre-submission stage) on or before the publication date (+ one month) and is no more than 200 dwellings below the published relevant Local Housing Need figure. Draft Policy PSD1 details that there is a proposed minimum local housing requirement of 400 dwellings per annum to be delivered in the Borough over the Plan period 2020-2040; as compared to the draft LHN figure of 593dpa.

Therefore, as the gap between the emerging local plan and the draft NPPF is 193 dwellings which, whilst not greater than the 200 dwellings, is evidently right at the limit of divergence from the LHN figure for progressing with the current Local Plan.

Clearly, it is in the Council's gift to continue with its Local Plan under the current 2023 NPPF; which we do not dispute. However, we consider that the draft NPPF and the emerging revised standard method for calculating local housing needs does represent the exceptional circumstances which would justify providing a significantly higher housing requirement within the emerging Local Plan.

The changes to the NPPF and the need for a significant shift from the current method were announced within Angela Rayner's Written Ministerial Statement (which should be given weight in planning decisions) and states:

"A mandated method alone is, however, insufficient to deliver on our scale of ambition and the current 'standard method' is not up to the job. It relies on decade-old population projections, an arbitrary 'urban uplift' that focuses too heavily on London and it lacks ambition across large parts of the country. We are therefore updating the standard method and raising the overall level of these targets – from around 300,000 to approximately 370,000. The new method provides a stable and balanced approach. It requires local authorities to plan for numbers of homes that are proportionate to the size of existing communities, by taking 0.8 per cent of existing stock as a floor, which is broadly consistent with the average rate of housing growth over recent years. It also then incorporates an uplift based on how out of step house prices are with local incomes, using an affordability multiplier of 0.6 per cent, up from 0.25 per cent in the previous method."

It is clear from the above that the new Standard Method provides for a level of growth which is required for the borough to keep pace with the average level of growth across the country and to help address local affordability issues. In essence, the emerging standard method is the minimum level of growth to prevent the borough falling behind the average rate of growth for the country.

It is worth noting here that the HEDNA Update states at paragraph 3.4 that an average of 351 homes per annum had been completed over the eight most recent years then reported (2014-22) however this drops to 338 dwellings per annum, when incorporating the extra year of data now available (2022/23).

It is clear that the borough is currently delivering significantly below that rate and requires a boost in the number and range of housing land supply opportunities to boost its immediate supply of housing.

The Government have made it clear that this is the direction of travel for the planning system in the coming years and with the requirement for Local Plan's to be reviewed at least every five years, it makes sense for the Council to begin to grapple with some, if not all of the additional requirement which the borough will need to provide for during the course of the plan period. Indeed, this will include the planning for the required physical and social infrastructure which the borough will need to support that development. Moreover, whilst the Government proposed so set the threshold for continuing to progress with current local plans at 200 dwellings of divergence from the emerging LHN figure, that divergence applies to all boroughs in the Country, even those with annual housing needs figures in the thousands per annum (where a divergence of 200 units could be considered a relatively insignificant difference). In Newcastle-under-Lyme, the emerging housing requirement within the Local Plan would represent only 2/3rd of the amount of growth which would be considered as the bare minimum of growth needed against the emerging method. That difference is stark and, we would argue, comprise the exceptional circumstances which would justify a review of the current plan's position.

Paragraph 33 of the current NPPF (proposed to be unchanged at paragraph 34 of the draft revised NPPF) set out: "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."

We acknowledge that this Regulation 19 Draft Local Plan was published at the same time as the draft NPPF 24 and the WMS was released for consultation. The Council could not reasonably have been expected to take the contents of the NPPF into account of the impact of the revised methodology for calculating LHN in publishing its Local Plan or within its Sustainability Appraisal.

However, as above, it is clear that local housing needs are going to change significantly in the near future for the borough and that the NPPF would require the Local Plan to be subject to an early review in that circumstance. Indeed, in the event that this Local Plan were to reach Examination alongside the publication of the NPPF, paragraph 227 of the draft NPPF expects the Council to "commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need".

We consider that, in the above circumstances, it would be appropriate for the Local Plan to take account of its likely shortfall against the emerging LHN and to consider whether those changes justify an alternative approach to setting a housing requirement for the borough. That consideration ought to be given some formal process and the sustainability impacts of that decision should be properly assessed.

In that regard, we consider that it would be appropriate to undertake an assessment of an uplift to address the emerging LHN figure within the Council's assessment of Reasonable Alternatives within the Sustainability Appraisal (SA). Assessment of Housing Growth Options

As above, we recognise that the Sustainability Appraisal (SA) of the Regulation 19 NuLLP was produced prior to the publication of the 2024 draft National Planning Policy Framework and therefore does not account for the potential impacts of changes in policy.

The Sustainability Appraisal (SA) of the Reg 19 NuLLP as currently drafted provides three updated housing options as shown in Figure 1 (Table N.4) below. Paragraph D.2.1.5 states that this was due the council's concerns that the standard method figure will not provide enough homes to align with the latest employment growth forecasts for the Plan period.

Figure 1: Table N.4: Newcastle-under-Lyme Housing Growth Options identified by NuLBC at the Regulation 19 stage (see attachment)

Paragraph N76 of the Sustainability Appraisal (SA) (July 2024) states that Option 2 has been identified as the best performing overall, seeking to provide the best balance between economic, social and environmental outcomes, through ensuring housing growth aligns with the economic and employment growth forecasts in contrast to Option 1, but providing a lower quantum of growth than Option 3 and thus reducing environmental impacts. Newcastle-under-Lyme Borough Council Local Plan 2020-2024 Representations on Regulation 19 Submission Draft Project: 33313360200 0-11

The SA also details in Table D.2.3 that there is therefore some concern over the realism of the higher growth option 3, particularly when balanced against site opportunities and constraints within the Borough.

Figure 2 (Table N.5) below presents the assessment of the housing growth options identified by NuLBC at the Regulation 19 stage. The assessment indicates that Options 2 and 3 were evaluated as having identical impacts which does not then necessarily support the selection of Option 2 on the basis of its reduced environmental impacts (from a lower level of growth). Figure 2: Table N.5: Impact matrix of the three housing growth options identified by NuLBC at the Regulation 19 stage (see attachment)

If both Options 2 and 3 have the same environmental impact score it is important to consider what other factors were promised in favour of Option 2. It stands to reason that more homes will have a bigger impact environmentally, but a lesser impact in terms of meeting social and economic needs. It is therefore hard to see how the balance was found.

Indeed, the SA sets out that the three housing growth options were assessed at each stage of the Local Plan's preparation have been "based on the numbers derived from the Housing and Economic Needs Assessment (HEDNA) Update (2023) for housing growth in the Newcastle-under-Lyme Borough for the Plan period. These three options related to variations on the standard method at the time of their evaluation, and modelled employment forecasts relating to population growth."

In essence, the SA has taken the Standard Method as its starting point and then applied an incremental uplift to it to assist in meeting economic forecasts (Option 2) and then a similar uplift to test the effect of additional growth. With each increment the level of environmental harm is considered to have grown and therefore the SA concludes that whilst an uplift to meet economic aims can be justified, each incremental step up from that will result in an incrementally more harmful shift from the environment.

Whilst there is some logic to that approach, the appropriateness of the baseline (the Standard Method) is not challenged because this is the baseline for meeting identified housing needs; accordingly, failing to meet those needs has also not been tested in the SA. To fail to meet basic housing needs would inevitably lead to negative impacts for sustainability overall, including the environment. A failure to meet housing needs will result in a failure of economic performance, decline of services and facilities and the creation of unsustainable patterns of movement (where people travel further for jobs and services) as well as a decline in investment in the places we live, play and keep well.

In that sense then, the SA provides an oversimplified picture that more growth results in a worsened environmental picture. It is essential that the borough receives the right amount of growth to meet its needs for the plan period; not only to encourage growth, but to avoid decline. This is the aim of the emerging revised Standard Method which is based on a percentage of existing housing stock and overcoming barriers to affordability.

In that context, we consider that the current growth options assessed in the SA, when considered against the emerging LHN would perform much worse socially, economically and environmentally because, as a baseline, they do not meet their housing needs. Conversely, if the SA assessed an option for growth that met the emerging minimum of 593 dpa, the environmental impacts associated with those would be akin to those within Option 1 of the SA as drafted, because they are relative to the assumption that the borough is meeting its housing needs. Clearly, on undertaking that assessment it would be for the Council to form a judgement on the appropriate level of growth for the Local Plan to meet and without those reasonable alternatives being assessed within an SA it is not possible for that judgement to be made. However, it stands to reason that, if the emerging LHN of 593 dpa is not to be taken as the baseline, that there would be some considerable benefit to the housing requirement being increased some way to meet it.

To do so would be in line with the stated Vision of the draft Local Plan at paragraph 4.1 which states: "By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people to enjoy quality of life. We will have delivered on the journey to delivering a sub-regional exemplar business park at Junction 16 of the M6 Motorway to support sustainable economic growth and take advantage of the accessibility of the Borough to the wider strategic transport network. High quality and well-designed places and spaces will support healthy, safe and connected lifestyles."

We note above that the SA had some concerns over the realism of a higher growth option (in this case Option 3 for 435 dwellings per annum) when balanced against site opportunities and constraints within the Borough. As will be explored within the remainder of these representations, it is our view that the Council has not fully explored the extent to which sustainable opportunities for housing growth exists within the borough which could meet an increased housing requirement; in particular, our Client's Site at Woodside, Baldwin's Gate.

<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reprs.pdf</a>
<b>Comment ID</b>	NULLP688



<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>Jones Homes is in broad agreement with Policy PSD6 as drafted and is committed to promoting and enabling healthy communities. However, at provision 1.a. the Council require development to follow Sport England's Active Design Principles (as updated). This provision is a concern as it will mean NuLBC signing up to and requiring all future development to adhere to currently unknown active design principles. NuLBC will in essence be relinquishing control of this design area to a quasi-non-governmental organisation. A more positive and justified approach would be for Policy PSD6 to require developments to account of Sport England Active Design Principles where possible as a material consideration in decision making.</p> <p>In addition, at provision 1.f, the Council state that development should 'provide access to accessible sports facilities and green spaces and opportunity for recreation and leisure that is available and affordable for all ages and abilities'. To be justified, this provision needs to be more specific. For example, in what specific development scenarios will this provision be applied? And what does the Council consider to be 'accessible'? Depending on the scale and location of development, it may not be justified for development to provide access to accessible sports facilities.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP697
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>At provision 3 of Policy CRE1, the Council state that 'Residential developments should be designed to achieve a maximum of 110 litres per person per day, in line with the optional standard of Building Regulations, Part G'. This provision is not justified for Applicant's should not be required in planning policy to meet an optional building regulation standard. A more justified approach would be for Applicant's to have regard to Building Regulations Part G and provide justification of any deviation from it.</p> <p>At provision 6, the Council provide a list of sustainability features which developments'should' include. This wording is too prescriptive and not justified. A more appropriate approach would be set out how</p>

	development 'could' incorporate some of the sustainable features put forward in the policy. This would ensure that developments can come forward appropriately, informed by the unique constraints and opportunities of each development site.
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>
<b>Comment ID</b>	NULLP686
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Jones Homes & Renew Land Baldwins Gate Ltd)
<b>Consultee Family Name</b>	Jones Homes & Renew Land Ltd
<b>Agent Company / Organisation</b>	Stantec
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Connell
<b>Agent Given Name</b>	Lydia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>These representations are submitted by Stantec on behalf of Jones Homes (North West) Ltd (Jones Homes) and Renew Land Baldwins Gate Ltd (Renew Land), together known as "the Promoters", in response to the Final Publication Draft of the Newcastle-under-Lyme 2020- 2040 ('Local Plan') at Regulation 19 published by Newcastle-under-Lyme Borough Council (NuLBC) ('the Council) in August 2024. Please also see attached representations.</p> <p>Settlement Hierarchy and Distribution</p> <p>The adoption of a clear adoption of a clear settlement hierarchy within the NuLLP is supported, as is the recognition of the role that Rural Centres can play in meeting the development needs of the Borough as a whole. We agree that maintaining the role of the rural centre by securing their ongoing vitality and viability is fundamental to their continuing role as well as the health of their communities and surrounding hinterlands.</p> <p>Jones Homes and Renew Land support draft Policy PSD2: Settlement Hierarchy which seeks to maintain the role and function of Baldwins Gate as a Rural Centre.</p> <p>Policy PSD 2 states, in relation to Rural Centres: "Rural Centres provide a role in service provision to the local population and contain several essential services and facilities in order to meet the day to day needs of residents. The Rural Centres will meet some of the development needs of the Borough, commensurate with their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character. It is recognised that there are differences between these villages in terms of their sizes and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity. The Rural Centres are Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint). The University Hub is expected to receive a balanced level of growth commensurate with its role as a strategic hub whilst recognising its rural role and function."</p> <p>We support the above policy that recognises that there are differences between villages in terms of their sizes and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity.</p> <p>Draft policy PSD3 seeks therefore to distribute development throughout the settlement hierarchy. The supporting test to PSD3 sets out, however, that the figures presented in this policy are intended as a guide and are neither a ceiling nor a specific target. We consider that whilst figures set out within PSD3 should certainly not be a ceiling, delivery of those number of dwellings is essential to the borough meeting its housing needs as a whole. We consider, therefore that PSD3 should require that the level of development it seeks to distribute should be met as a 'minimum'.</p> <p>The resulting Distribution of Development the Rural Centres is set out as follows:</p> <ul style="list-style-type: none"> <li>• Audley and Bignall End (joint) in the order of 250 new homes</li> <li>• Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint) in the order of 250 new homes</li> <li>• Loggerheads in the order of 450 new homes</li> <li>• Baldwins Gate in the order of 250 new homes</li> <li>• Keele and Keele University (joint) in the order of 800 new homes</li> </ul> <p>The Local Plan notes that commitments and completions since the start of the Plan period will contribute towards the indicative targets outlined above and to maintain an available supply of housing land. The broad level of development proposed for those settlements will be delivered through a combination of Local Plan site allocations and through existing housing land supply.</p> <p>We have fundamental objections to the Local Plan's approach to the distribution of development to the Rural Centres. We will demonstrate below that the Local Plan does not have a robust, consistent or transparent methodology for determining the level of growth distributed to each settlement. We conclude that the eventual distribution of growth which has been landed on has been based loosely on a perceived availability of housing land supply at those centres which, again, has not been assessed in a robust, consistent or transparent way. We conclude that the Local Plan, in this regard does not pass any of the tests of soundness set out within the NPPF.</p>

The supporting text to PSD3 at 5.15 of the Local Plan states that the proposed distribution of development for the Borough has been established from: "assessing reasonable alternative options for the distribution of development informed by previous Local Plan consultation stages, the evidence base and Sustainability Appraisal (SA). The process undertaken to establish a development distribution and the consideration of site options is set out in the Plan Strategy Topic Papers, Site Selection Paper and SA Report."

In the first instance, disappointingly, there is no one source of truth for how the above distribution model has been arrived at or how a methodology has been applied. The closest document to providing an explanation is the Housing Spatial Strategy Topic Paper [ED031] which seeks to show the evolution of the distribution model from the Regulation 18 draft of the Local Plan. Paragraph 5.18 of that document sets out that, at Regulation 18, "Housing site options for these settlements were considered in relation to broad distribution factors, settlement hierarchy and the merits of individual sites through the site selection process."

For the rural service centres, paragraph 5.86 – 5.88 explains:

In accordance with strategic factors it is appropriate to primarily direct growth to the strategic and urban centres. As part of a balanced distribution of development a proportionate level of growth is also appropriate in the rural service centres commensurate with their role and function including the range of key facilities and infrastructure. The Regulation 18 preferred spatial strategy identified a proportionate quantum of development for the rural service centres that combined with the strategy for the strategic and urban centre provided for LHN.

A site selection process was also undertaken for the rural service centres consistent with the broad distribution factors and settlement hierarchy to direct an appropriate scale of growth to these settlements. Bottom-up considerations and the merits of the sites have then been considered informed by site specific SA, key evidence studies and ongoing stakeholder engagement to identify a shortlist of preferred sites. It is considered that there are no further reasonable alternative growth scenarios for the rural service centres. Scenarios identifying higher levels of growth in these settlements would be inappropriate in relation to broad distribution factors, settlement hierarchy and the availability of key facilities / infrastructure. The most sustainable sites for these settlements have been identified through the site selection process. It is considered that there are no further reasonable alternative growth scenarios to appraise for these settlements.

In essence then, ED031 sets out that the Reg 18 Local Plan sought to distribute development between the Rural Centres (having decided what the overall level of growth would be) in accordance with the suitability of the rural centre for growth (based on services and facilities).

The Rural Area Topic Paper (RATP) (2024) sets out the methodology for establishing the position of the rural settlements. Table 3 of the RATP sets out the sustainability of settlements and shows that Baldwins Gate and Loggerheads are the only Rural Centres that meet all sustainability criteria for meeting the day to day needs of their populations on their own, without the reliance of being considered alongside a nearby settlement.

Notwithstanding the above, and without any reasonable explanation the Reg 18 Local Plan failed to allocate any development towards Baldwins Gate. Our Representations to the Reg 18 Local Plan consultation (at Appendix 2) set out the reasons that approach was unsound and stressed the importance of providing a proportionate level of growth to the Rural Centres to maintain their vitality and viability. The Reg 18 Local Plan did set out that a Planning Appeal at Baldwins Gate Farm was due to be determined at Inquiry following the consultation on the Local Plan and that the LPA would revisit its position on allocating development to Baldwins Gate subject to that appeal. That appeal was subsequently allowed and that site has subsequently been allocated for development.

The failure of the previous local plan to allocate any development towards Baldwins Gate despite it being demonstrated as equally the most sustainable Rural Centre within the borough demonstrates that the conclusions reached by the Local Plan (not to allocate growth) were not reflective of the approach reported to be being taken within the Plan Strategy Topic Paper. Indeed, the approach to Site Selection is completely absent insofar as the only Site which was to be allocated was one which was successful at appeal.

Contrary to paragraph 5.15 of the draft Local Plan, the Sustainability Appraisal (SA), Site Selection Methodology or other parts of the evidence base do not provide any further information as to how the decision has been made to proportion development among the rural centres. The resulting distribution of development does not bear out a logical approach to distribution on any one of, or combination of the factors set out to have been considered within ED031; or if it has, it has not been presented transparently to the reader of the plan or its evidence base.

This lack of evidence based approach is borne out in the disparities between the different Rural Centres and how growth has been distributed amongst them.

Notwithstanding having identical settlement status, and sharing an equivalent number of services and facilities, draft Policy PSD3 seeks to apportion some 450 dwellings to Loggerheads over the plan period in comparison to 250 dwellings at Baldwins Gate. We consider that failing a more robust methodology than the Council has provided, the Local Plan should be bound to at least a fair and even distribution of development across its sustainable settlements in line with their access to services and facilities; i.e. Baldwins Gate should at least be apportioned 450 homes in line with Loggerheads.

Notwithstanding the lack of methodology for the distribution of growth having been provided within the evidence base for the Local Plan, it can be fairly readily deduced that the eventual quantum of development for each Rural Centre has been arrived at as a result of the number of sites (and their capacity) that the Council considered was available and appropriate to bring forwards. In the case of Baldwins Gate, that is certainly true where the disaggregation of development towards it has only happened as a result of planning permission having been granted at appeal; as made clear by the Reg 18 Local Plan and the Plan Strategy Topic Paper [ED031].

We do not consider it inherently unsound to distribute development across a range of settlements based on, in part, the availability of suitable sites for development. However, if that is the approach that a Local Plan is to take, it must be soundly done and, as such, must be positively prepared, justified, effective and compliant with national policy. Notwithstanding those tests, it must also be done fairly and with

transparency such that the reader (including a Local Plan Inspector Examining the Plan) can see and understand the process which has been undertaken.

Such an approach has not been executed in the case of the NuLLP. Putting to one side that the methodology purported within the evidence base (distribution commensurate with the role of the settlement) doesn't reflect the one that has been taken (distribution based on site availability), the approach to Site selection is not considered to be robust or transparent.

The Site Selection Methodology (SSM) Report within the Council's evidence base at paragraph 2.1 sets out the stages to site selection as: The site selection process comprises several stages. There may be instances where sites have had to move between stages on an iterative basis. The stages are: -

Stage 1: establish a pool of sites to consider through the Strategic Housing and Economic Land Availability Assessment (SHELAA)

Stage 2: First site sift using the list of SHELAA to generate a list of sites for further consideration through the process

Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres".

Stage 4: Site Assessment using SA (Sustainability Appraisal), HRA (Habitats Regulations Assessment) and appropriate relevant evidence.

Stage 5: Evaluation and initial recommendations - have enough non-Green Belt sites been identified in the centre to meet the distribution of development. If development needs have not been met through: -

- Allocation of non-greenbelt sites
- Discussions with neighbouring authorities to meet the Borough's need
- There are exceptional circumstances Then consider Green Belt sites for allocation

Stage 6: Public consultation and input from statutory consultees

Stage 7: Final site sift and site selection (our emphasis)

We have no material objection to Stage 1 and Stage 2 of the SSM as a mechanism; we consider that it is appropriate for the SHELAA (informed by the call for sites process) to inform the pool for sites to be considered. Taking Baldwins Gate as an example, some 9 sites were identified in that process in Baldwins Gate and a further 4 within the surrounding area. All were sifted in to Stage 3.

The fundamental objection we have with the SSM is in Stage 3 which, as above, is stated as: "Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres"

In essence, the SSM states that once it has found enough sites to meet the required number of dwellings within a centre, it can take the decision to discontinue the search for sites.

In the case of Baldwins Gate specifically, this is a completely circular argument and self fulfilling. Table 35 of the SSM sets out the summary position for Baldwins Gate that there is a 'target of 250 dwellings' and 49 committed dwellings within the settlement.

At Stage 3 (paragraph 10.1-10.3), it sets out: "10.1. Table 35 (above) highlights that commitments and completions are insufficient to meet the indicative development requirements for Baldwins Gate Therefore, it is necessary to continue with the site selection process.

However, site LW74 (Baldwins Gate Farm, Newcasttle Road) has planning permission granted post 31 March 2023 at appeal for 200 dwellings within a community parkland. The appeal decision, alongside planning permissions and completions in Baldwins Gate are considered to be in the order of 250 dwellings." The SSM suggest that, co-incidentally, the distribution model has a 201 dwelling deficit which has been filled by development of 200 dwellings won at appeal and therefore, the SSM can end its search for further sites for development. However, as set out above, we know from the previous Reg 18 Local Plan, and the lack of other methodology provided, that the figure of 250 dwellings has been arrived at precisely because there was an appeal decision which allowed 200 dwellings (in addition to 49 dwellings which are existing commitments).

As above, this methodology is entirely circular, is not based on a robust methodology and is not plan led.

Indeed, as set out below, even if the above circular methodology was applied and development was to be allocated to the Rural Centres based only on the Council's preferred Sites, that selection methodology (for the comparison and selection of sites) must, in itself, be robust. Again, we consider that no such fair and transparent process has been undertaken, particularly with regard to Baldwins Gate.

Indeed, as set out within both the SHELAA, the SSM and the Sustainability Appraisal, the land at Baldwins Gate Farm (which has been allocated) does not perform materially differently to other Sites which have been sifted into the SHELAA by the Council's assessment. Indeed, the Council itself refused development for Baldwins Gate Farm. We provide a commentary on that process below.

Jones Homes' site has been considered within the Site Selection Report (informed by the SHELAA) under reference LW38. However, this was discounted from consideration for allocation based on "concerns over access arrangements into the site and the loss of agricultural land."

In terms of the loss of agricultural land, the Baldwins Gate Farm appeal was allowed despite the site being located on Grade 2 and 3 agricultural land. Jones Homes' site is on exclusively Grade 3 land. Moreover, that Grade 3 land is predominantly 3b land which is not Best and Most Versatile land and prevents the Site as a whole from being farmed as BMV (as demonstrated within the Agricultural Land Classification Report submitted with Jones Homes pending planning applications). Loss of agricultural land should not be seen as a barrier to development.

In terms of access concerns expressed, no detail is given as to what these relate to specifically. However, transport assessment work undertaken by Jones Homes in support of the pending planning application has shown that the Site can be accessed safely.

Responses from the LHA in relation to the planning application demonstrates the same.

Furthermore, the recent appeal decision at Baldwins Gate Farm showed that there is the potential for safe access to be delivered in this part of the settlement based on existing highway capacity. The development of the Jones Homes' site offers the opportunity to provide a more recognisable gateway into the settlement from the west and as such increase highway safety further.

	<p>As such, not only is the Jones Homes site is an entirely suitable site for allocation within the NuLLP (and would assist in meeting the established spatial strategy of the Plan) we consider it performs equal or better than the Site at Baldwins Gate Farm which was allowed at appeal and other comparison sites assessed within the SHELAA.</p> <p>As such, the site selection methodology needs revisiting in order to accurately assess Jones Homes' site and conclude that it is appropriate for allocation.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q9 Hearing reasons</b>	Please see attached representations.
<b>Attachments</b>	<a href="#">1364002 Jones Homes Reps.pdf</a>



<b>Comment ID</b>	NULLP427
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Kelter
<b>Consultee Given Name</b>	Aaron
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>While Policy AB2 outlines the development of a strategic employment site at Junction 16 of the M6, there are serious concerns regarding its justification, feasibility, and long-term viability:</p> <ol style="list-style-type: none"> <li><b>1 Unjustified High-Growth Strategy</b> Newcastle-under-Lyme Borough Council (NuLBC) is applying an ambitious high-growth strategy without presenting any substantial evidence to suggest that this level of growth will transpire. The council's projection of high demand for employment land seems speculative, especially given the uncertainty in economic conditions. The absence of clear, data-driven justification renders the strategy neither realistic nor deliverable, calling into question the soundness of the policy. Without solid evidence to support such growth predictions, this approach is overly optimistic and not grounded in the current economic climate.</li> <li><b>2 Over-Allocation of Strategic Employment Land</b> NuLBC claims they require 22 hectares of strategic employment land, but they are allocating a significantly larger area—80 hectares—at the AB2 site alone. This allocation is disproportionate to the demonstrated need and raises concerns about the unnecessary overdevelopment of land. Such an over-allocation is not justified by existing demand or future projections, making the policy unsound. It also risks unnecessary environmental degradation and misuse of land that could be preserved for more appropriate uses.</li> <li><b>3 Inadequate Traffic and Infrastructure Planning</b> The existing high traffic volumes at Junction 16 of the M6 and the surrounding villages already cause significant congestion. The development would substantially increase traffic, especially from Heavy Goods Vehicles (HGVs), exacerbating these issues. The proposed upgrades to the junction and surrounding infrastructure are heavily reliant on funding from Highways England, which, given the £22 billion shortfall in the national finances, is unlikely to materialize within the timeframe of the local plan (before 2040). This makes the infrastructure improvements undeliverable, thus rendering the policy ineffective and unsound. Without these crucial upgrades, the development would significantly impact road safety, traffic flow, and local quality of life.</li> <li><b>4 Environmental Impact and Sustainability</b> While the policy highlights sustainable energy strategies, including solar technology and reduced grid reliance, these initiatives are not clearly defined, and their feasibility remains questionable. Given the scale of the development, the environmental impact on biodiversity, local ecosystems, and air quality could be severe. The reliance on BREEAM standards and landscape buffers may not fully mitigate these effects, especially if enforcement is weak. Without clear, enforceable sustainability measures, the policy risks failing to deliver on its environmental promises.</li> <li><b>5 Questionable Economic Viability</b> Despite the policy's focus on creating employment opportunities, the assumption that such development will generate significant local jobs is debatable, especially as industrial processes become more automated. The overestimation of employment growth could lead to an underutilized site, particularly if job creation does not match the scale of the land allocated. Furthermore, if the required skills are not aligned with the local workforce, the benefits of job creation may be limited, further diminishing the policy's economic justification.</li> <li><b>6 Lack of Long-Term Management Strategy</b> The policy touches on the need for long-term maintenance and management but lacks concrete details on how these responsibilities will be enforced after the initial development phase. Without a clear strategy, there is a risk that the infrastructure, public spaces, and amenities will deteriorate, leaving local authorities and residents burdened with maintenance costs. A well-structured management plan should be included to ensure the sustainability and upkeep of the development.</li> <li><b>7 Heritage and Cultural Assets at Risk</b> Although the policy mentions a Heritage Impact Assessment, it may not adequately protect less-documented heritage assets that could be uncovered during development. The vague requirement for mitigation "where retention is not possible" could lead to the destruction of historical sites. A more cautious approach should prioritize preservation, ensuring that the area's cultural and historical significance is not lost due to development pressures.</li> </ol> <p>On top of these points, at no part has anyone been to visit the local community that will be effected by this policy. On the map there is a cut out for 3 cottages, these cottages will be surrounded by the site and the impact this will have on those home owners.</p>
<b>Q7 Modification</b>	Policy AB2, while ambitious in its vision for a high-quality strategic employment site, raises several critical concerns. The lack of robust environmental safeguards, questionable job creation potential, inadequate



	<p>traffic and infrastructure planning, and the vague long-term management strategy suggest that the development could have lasting negative effects on the local community and environment. A more cautious, community-focused approach, with stronger enforcement mechanisms and clearer economic and environmental commitments, is needed to ensure that the benefits of the development outweigh its potential harms.</p> <p>I would advise the planning inspector to actually visit the site location, in particular, visit the location of the 3 cottages and see what impact this would have on them. If the plan is to go ahead I would advise that these 3 cottages to be purchased as part of the plan and square AB2 site off to stop other complaints. Noise, light, mental wellbeing etc.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP185
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Kent
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP225
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Kent
<b>Consultee Given Name</b>	Richard
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP1423
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Kerr
<b>Consultee Given Name</b>	Martyn
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.</p> <p>Especially AB12, this should not be considered for housing as an area of greenbelt, and the local plan should place greater emphasis on developing brownfield sites in high density areas, like vacant town centre buildings, rather than extending the sprawl of properties on already crowded main roads through our villages.</p> <p>On daily walks through the parish, and sitting in our garden, we are inundated with birdsong, the sounds of nature and free wildlife. Especially in the evenings, owls can be seen and bats flap freely through the air. Destroying our rural landscape will tear away the identity this parish has cultivated.</p> <p>PLAN: AB12 I OBJECT TO THIS PLAN. We moved into our house (directly opposite the proposed entrances off Ravens Lane for the AB12 site) in April 2022. The blind bend coming down the bank past our property causes a daily issue leaving our drive and turning right towards Bignall End, or left towards Audley. We have to wait, with our car window down, to have a chance to hear if a vehicle is coming down the bank. We have had a number of near misses. The current level of traffic on this road, and the number of illegally parked cars means that leaving our drive safely is a challenge. Measures are required to leave the drive safely. Illegally parked cars have been reported to the police and council. See attached images for the current level of cars parked illegally and the level of difficulty we have exiting our drive safely.</p> <p>When reading the local plan, and finding that the proposed entrance to the AB12 site would be placed in the middle of this blind bend, my thoughts went straight to the safety of road users and the increase of traffic down an already busy road. The placement of the entrance will mean anyone leaving the site will have no view up or down the bank, due to the parked cars and level of traffic. The access road suggested does not appear wide enough to support safe entrance or exit from the site, and the access road cannot be widened due to the houses directly adjacent. What if an ambulance needs to access the houses, but due to the small access road and increase in local traffic, it cannot navigate the bottle neck of Ravens Lane? Take into account that Ravens Lane is also a popular diversion route when the M6 or A500 become blocked at peak times. This causes an increase in HGV and large vehicle traffic, which bottle necks on the bend by the AB12 site. Therefore, this proposed site for housing does not in any way feel suitable just based upon the safety of road users. The proposal on this site using unsuitable access roads feels like a desperate attempt to squeeze in houses, regardless of the safety implications on roads. Using an access road on Diglake Street would not be suitable. The road is narrow, the footpaths even narrower. Children and families walking to school or nursery would be at risk on a daily basis. The current level of traffic is already too much for the road to handle.</p>
<b>Q7 Modification</b>	I wish the local councillor to remove sites AB12, AB2 and AB33 from the local plan.
<b>Attachments</b>	<a href="#">1339677_MartynKerr.pdf</a>
<b>Comment ID</b>	NULLP1427
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Kerr
<b>Consultee Given Name</b>	Martyn
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.</p> <p>Plan: AB2 I OBJECT TO THIS PLAN. The AB2 proposal raises many concerns for me as a local resident and a person who enjoys the countryside afforded to us in the Audley Parish. My partner and I use the local roads in this area for walks, runs and cycles. One of the greatest assets in this area is the long sprawl of countryside, creating the rural landscape we all love. This development alone would rob our area of the title 'rural' as the stolen greenbelt land would be lost forever to the needless development of even more industrial units, which if the sites in Alsager and Tunstall are anything to go by, will remain</p>

	<p>unoccupied for years. We regularly drive past empty, derelict brownfield sites on the A500. How can the local council consider tearing up greenbelt land when there are acres and acres of already developed, ready to change brownfield sites? By developing on this site, currently undeveloped land which is an extremely valuable natural carbon store, there will be an increase in carbon emissions. Many of the hedgerows that will be removed in this plan are protected on the government website, due to the range of tree species.</p> <p>From the local plan, the increase in local employment and boost to the local economy has been noted as a reason for this proposal. Knowing the local area well, I cannot state strongly enough that this will not be the case. Local services will not be used by the workers on this site, as the local shops and amenities are too far away to walk to. There are no longer any bus regular bus routes that connect Audley and Newcastle, so there will be no increase in public transport use. Due to the challenging terrain, steep banks and tough climbs on the roads from Newcastle, cycle users will not commute to the site. As someone who has cycled and ran on every road in the parish and wider borough, this is not a viable benefit. Therefore, the only way the site will be accessed is by car, increasing the traffic through old, pot-holed and already busy roads in the local villages. The roads through the village, particularly in Audley, have been riddled with pot holes for years. If the council cannot look after the road surface now, with the current level of road use, how can they guarantee a good quality of road surface with increased traffic from all sorts of vehicles if these plans go ahead?</p> <p>The jobs offered by this site will not go to our local residents. As the site is right on the edge of the borough, and the St Modwen website notes that jobs can be accessed one hour commuter distance, the jobs will be open to an estimated population of 9 million people, a small percentage of those coming under the umbrella and of Newcastle-under-Lyme. So, the suggestion that this site will aid the employment and economy of the local area is just not true.</p>
<b>Q7 Modification</b>	I wish the local councillor to remove sites AB12, AB2 and AB33 from the local plan.
<b>Attachments</b>	<a href="#">1339677_MartynKerr.pdf</a>
<b>Comment ID</b>	NULLP1430
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Kerr
<b>Consultee Given Name</b>	Martyn
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The proposals AB12, AB2 and AB33 sites are unsound and should not be included in the local plan.
<b>Q7 Modification</b>	I wish the local councillor to remove sites AB12, AB2 and AB33 from the local plan.
<b>Attachments</b>	<a href="#">1339677_MartynKerr.pdf</a>



<b>Comment ID</b>	NULLP905
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	King
<b>Consultee Given Name</b>	Rob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Basically we cannot see that the proposals are sound for a number of reasons, these mainly relate to access to the site and the current proposals.</p> <ul style="list-style-type: none"> <li>- The lorry park will cater for 200 lorries which means there is the potential for 400 HGV vehicles per day accessing the site as they arrive and leave.</li> <li>- The site could have up to 3,300 employees so they will arrive and leave depending on shift patterns but potentially 6,600 vehicles per day arriving at and leaving the site. It is acknowledged that the developer funded public transport option, if it is ever implemented, may reduce these figures by 10% but that's insignificant.</li> <li>- In addition there will be actual deliveries to the distribution centre and vans then collecting items for onward distribution, I cannot see any numbers advised relating to this.</li> </ul> <p>It is not clear of the frontage of the proposed site along the A500 and how many metres the entrance is from the junction 16 roundabout, but it would seem up to 300 metres. The proposal seems to be for some traffic lights at the new junction and the eastbound carriageway will include a break in the central reservation and the ability for eastbound traffic to cross the westbound carriageway. This seems inadequate for such a quantity of vehicles and will result in the following: - Eastbound traffic will back up to the M6 roundabout and cause gridlock.</p> <ul style="list-style-type: none"> <li>- Westbound traffic already backs up to the Audley exit and beyond and currently can cause a 15 minutes delay and not the 1-2 minutes that the report seems to suggest.</li> <li>- Vehicles will use the Audley/Alsager bridge to access the westbound carriageway rather than use the new junction.</li> <li>- Local non site traffic will travel through Audley to avoid this congested area of the A500. This will severely affect air quality and traffic flows, cyclist, pedestrians and the ability to even cross the road. The observations that traffic flows have not increased from 2015 to 2022 is incorrect, it seems that as the survey was done in the pandemic so 2011 census figures have been used which is clearly not sound.</li> </ul> <p>The proposed access area to the site already seems to be a problem based on the accident heat map and this will only increase.</p> <p>There does not appear to be any proposals in place to 'police' the proposed emergency site access route via Barthomley Road, this needs to have cameras and unauthorised traffic will need to be prosecuted.</p> <p>There seems to be a proposal to increase signage at junction 15 to encourage traffic to take alternative routes and discourage the use of junction 16 but in reality drivers will follow their satnav</p>
<b>Q7 Modification</b>	<p>We understand the needs for the site and employment it will bring to the area but the access proposals are clearly not sound, as such we would like the following to be considered.</p> <ul style="list-style-type: none"> <li>- An M6 access to the site, the land frontage along the M6 is significant compared to the A500 access, this should include both northbound and southbound access and a bridge over the M6.</li> <li>- Alternatively, significant road widening on both sides of the A500 for a distance up to 500 metres where possible in both directions to provide an extra lane purely for access and exit to the site. That a bridge access is put in place so that A500 eastbound traffic can access and leave the site rather than traffic lights and a break in the westbound carriageway.</li> <li>- Camera footage policing of the Barthomley Road emergency access route and fines to enforce and ensure it is only used for emergency access.</li> </ul> <p>Our view is that the traffic calming measures should be avoided, whilst they will deter traffic from using the village, they will affect people in the village more. They will cause gridlock at peak times, we already have significant problems in some areas with parked cars so further obstacles, priority lanes, road narrowing and speed humps would clearly be detrimental in other respects. In an ideal world cycle lanes would be great, but the village roads are just not wide enough and these sorts of measures significantly increase pollution.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Someone from the local community which is being impacted needs to have input and a say

<b>Comment ID</b>	NULLP92
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Kingston
<b>Consultee Given Name</b>	Mary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Dear Sir/Madam</p> <p>Comments on the Newcastle-under-Lyme Local Plan 2020-2040</p> <p>1. I object to the inclusion of LW53, land at the corner of Muckleston Wood Lane, Loggerheads as this is not a sustainable location. Outline planning permission was refused by the planning committee on February 27th 2024 on the lack of sustainability. This is due to the absence of infrastructure in the area to support the development, limited public transport and the need to travel by car for employment, larger supermarkets, leisure facilities and even the doctors'. As the council have already stated that the site is not in a sustainable location, its inclusion in the plan contravenes the National Planning Framework 2023 (NPPF 2023)</p> <p>LW53 is currently farmed and consists of the best and most versatile agricultural land, which would be lost should development go ahead on this site. This is contrary to paragraph 180 pf the NPPF2023 and was another reason for the refusal by the Planning Committee. Brownfield sites should be prioritised, not greenfield sites.</p> <p>2. I also question the reason for Loggerheads to expand by 450 dwellings when other rural communities where around 250 dwellings are suggested. There is already a variety of housing in Loggerheads, including affordable housing and bungalows, and there is no indication as to how the figures were reached.</p> <p>In conclusion, I feel that LW53 should be removed from the Local Plan and the reference to an extra 450 dwellings for Loggerheads should also be removed.</p>
<b>Q7 Modification</b>	In conclusion, I feel that LW53 should be removed from the Local Plan and the reference to an extra 450 dwellings for Loggerheads should also be removed.
<b>Comment ID</b>	NULLP91
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Kingston
<b>Consultee Given Name</b>	Mary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Dear Sir/Madam</p> <p>Comments on the Newcastle-under-Lyme Local Plan 2020-2040</p> <p>1. I object to the inclusion of LW53, land at the corner of Muckleston Wood Lane, Loggerheads as this is not a sustainable location. Outline planning permission was refused by the planning committee on February 27th 2024 on the lack of sustainability. This is due to the absence of infrastructure in the area to support the development, limited public transport and the need to travel by car for employment, larger supermarkets, leisure facilities and even the doctors'. As the council have already stated that the site is not in a sustainable location, its inclusion in the plan contravenes the National Planning Framework 2023 (NPPF 2023)</p> <p>LW53 is currently farmed and consists of the best and most versatile agricultural land, which would be lost should development go ahead on this site. This is contrary to paragraph 180 pf the NPPF2023 and was another reason for the refusal by the Planning Committee. Brownfield sites should be prioritised, not greenfield sites.</p> <p>2. I also question the reason for Loggerheads to expand by 450 dwellings when other rural communities where around 250 dwellings are suggested. There is already a variety of housing in Loggerheads, including affordable housing and bungalows, and there is no indication as to how the figures were reached.</p> <p>In conclusion, I feel that LW53 should be removed from the Local Plan and the reference to an extra 450 dwellings for Loggerheads should also be removed.</p>

<b>Comment ID</b>	NULLP77
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Knox
<b>Consultee Given Name</b>	Elaine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Building on green fields is detrimental to everyone in the area. It destroys natural habitat but more importantly people of all ages need somewhere to walk, run, play, meet up and so on.</p> <p>Places where people can meet up have slowly gone. Local pubs = shut. Youth clubs etc = shut. People are bored and fed up. If you take any more off people locally many will have nothing.</p> <p>I grew up in (redacted by admin) and played in fields bordering the canal. I had a Good healthy childhood. Later I moved to (redacted by admin). Again, many used this as a place to meet up etc. Sadly, Bathpool Park and its car parks have a poor reputation now due to dodgy meet ups such as [redacted by admin] and illegal drugs. Conclusion is that it is not a safe place for children, normal dog walkers or any law-abiding citizen.</p> <p>Barnet's field* (which I always believed was gifted to Clough Hall High School for the purpose of outdoor activities and sports) is now one of very few areas of green space left. Walkers from Talke Pits come down the bank to walk here as well.</p> <p>Yes, we need more houses. But not on common green areas.</p> <p>Brownfield sites – there are many. Stop wasting time ripping up greenbelt areas such as the new area between Talke and Tunstall. This was a lovely quiet area with a pond and wildlife.</p> <p>Rubbish about relocating Newts etc – leave them where they are. Stop building more warehouses that will remain empty or cause more exhaust fumes due to traffic.</p> <p>*Re the area at Barnett's field. Where is the infrastructure for such a development? The A34 road is already too busy and narrow to take the current traffic without adding to it.</p> <p>The area will Become a soulless estate like the one in west avenue (although they still have a few areas with trees) Butt lane shops – not many and nowhere to park now that the insurance company have moved in.</p> <p>Kidsgrove has been ruined by Tesco and Home and Bargains taking over.</p> <p>We need local shops and local areas where people can go to spend time and relax.</p> <p>This whole planning document is outrageous and basically just a plan to build on any and all areas where there is grass.</p> <p>Next will be proposals to stop the spread of obesity that will come when there is nowhere for children, adults and families to go.</p> <p>I strongly object to this application for housing. This is destruction of the areas natural environment and fails to address housing where it is actually needed. Please STOP building here. There is very very little safe grassy areas left for us (for us read 'us' your taxpayers and voters).</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP183
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Lamb
<b>Consultee Given Name</b>	Philip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP226
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Lamb
<b>Consultee Given Name</b>	Philip
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.



<b>Comment ID</b>	NULLP1484
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Lambert
<b>Consultee Given Name</b>	Janet
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>We have lived in Red Street for 34 years, in those 34 years. Have seen two estates go up one Waterhays and one on Deans Lane. Witch has already caused a lot of traffic in the area we struggle to get in and out of are own driveway the traffic is that bad. We feel as a small community Red Street can not cope with any more traffic going through this area. Also we have a small school St Chads the staff are already struggling with the amount off children they have in each class. Are the council willing to build new facilities to support the amount people that will move in to the new houses. This area is already struggling with the amount of traffic coming through with the new industrial estate that have gone up. We will be losing more greenland the fumes off the traffic is unhealthy at the moment it will be a lot worse with more housing estates going up.</p> <p>Surely there must be other places you could consider. Where it is not so built up. Already we feel like we have had enough housing estates put up in this area over the last thirty years. As I write this letter the traffic is bumper to bumper in Red Street. We are fed up and really against it. It makes us sick.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1481
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Lambert
<b>Consultee Given Name</b>	Janet
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town</p>

	<p>and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1480
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Lambert
<b>Consultee Given Name</b>	Paul
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1483
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Lambert
<b>Consultee Given Name</b>	Paul
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>We have lived in Red Street for 34 years, in those 34 years. Have seen two estates go up one Waterhays and one on Deans Lane. Witch has already caused a lot of traffic in the area we struggle to get in and out of are own driveway the traffic is that bad. We feel as a small community Red Street can not cope with any more traffic going through this area. Also we have a small school St Chads the staff are already struggling with the amount off children they have in each class. Are the council willing to build new facilities to support the amount people that will move in to the new houses. This area is already struggling with the amount of traffic coming through with the new industrial estate that have gone up. We will be losing more greenland the fumes off the traffic is unhealthy at the moment it will be a lot worse with more housing estates going up.</p> <p>Surely there must be other places you could consider. Where it is not so built up. Already we feel like we have had enough housing estates put up in this area over the last thirty years. As I write this letter the traffic is bumper to bumper in Red Street. We are fed up and really against it. It makes us sick.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP831
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Leech
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>this plan is wrong on many fronts and should not go ahead</p> <ol style="list-style-type: none"> <li>1 The old golf course is water logged and holds thousands of litres of water if you put in roads the higher speed run will cause village flooding</li> <li>2 Access via Ashbourne drive will create a race track on and off the site twice a day 3. There is insufficient infrastructure ie schools, doctors, dentists, shops to sustain the influx.</li> <li>3 Parking in the village is overcrowded now we don't want more people 5. We already have traffic issues in the village just visualise a few hundred extra cars every day twice a day 6. Just don't do this lunacy 7. The golf course and surrounding fields are public open space and a green border for the village not a building plot.</li> <li>4 The actual action of building 1100 hose will increase traffic, pollution, and noise for the duration of the build.</li> <li>5 The access roads are unsuited to the massive traffic increase both during the building and after completion.</li> </ol>

<b>Comment ID</b>	NULLP832
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Leech
<b>Consultee Given Name</b>	Elizabeth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>this plan is wrong on many fronts and should not go ahead</p> <ol style="list-style-type: none"> <li>1 The old golf course is water logged and holds thousands of litres of water if you put in roads the higher speed run will cause village flooding</li> <li>2 Access via Ashbourne drive will create a race track on and off the site twice a day 3. There is insufficient infrastructure ie schools, doctors, dentists, shops to sustain the influx.</li> <li>3 Parking in the village is overcrowded now we don't want more people 5. We already have traffic issues in the village just visualise a few hundred extra cars every day twice a day 6. Just don't do this lunacy 7. The golf course and surrounding fields are public open space and a green border for the village not a building plot.</li> <li>4 The actual action of building 1100 hose will increase traffic, pollution, and noise for the duration of the build.</li> <li>5 The access roads are unsuited to the massive traffic increase both during the building and after completion.</li> </ol>

<b>Comment ID</b>	NULLP463
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Leese
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>For the NC13 development proposal there does not appear to be any evidence of any form of survey having been carried out to determine the impact the development would have on the local Health Centre for this area - Kidsgrove Health Centre.</p> <p>The Health Centre is already under extreme pressure, and the addition of another 200+ members of the public wanting to use this facility will make the situation even worse (200+ estimated as 1 couple per each new house proposed as a minimum).</p>
<b>Q7 Modification</b>	NC13 is unsuitable for development due to already strained road network in the immediate area
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP461
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Leese
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy IN2 refers to making appropriate accessible, efficient and safe transport network and suggests what should be done in various circumstances.</p> <p>For the NC13 development proposal there is no evidence of any form of traffic surveys having been carried out to determine how viable this proposal is, and if the needs can be met.</p> <p>Bullocks House road is already over stretched for the volume of traffic it has to cope with. There is only 1 route in and out of the village of Harriseahead, and this is via Bullocks House road which services volume traffic immediately from the Mow Cop areas southbound, and from the Newchapel, Packmoor and Kidsgrove areas north bound. Further afield traffic (people travelling to and from work in the wider surrounding areas) adds to this already congested road.</p> <p>Bullocks House road runs into Chapel Lane north bound, and Chapel Lane is already very heavily congested, with resident parking on one side almost all the way up Chapel Lane.</p> <p>Congestion is further exasperated on school days when parents bring their children to the primary school at the top of Bullocks House lane. Even now parents will park their vehicles opposite Ferndale Gardens, immediately opposite the proposed NC13 development site, as the road closer to the school is heavily congested. Safety of the school children is of paramount importance, but their safety will be further undermined with any form of increase in traffic due to the proposed development.</p>
<b>Q7 Modification</b>	NC13 is unsuitable for development due to already strained road network in the immediate area
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1486
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Lench
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1485
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Lench
<b>Consultee Given Name</b>	David
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this</p>

	<p>fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1164
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Lewis
<b>Consultee Given Name</b>	Rebekah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>2. Infrastructure and Transport Issues The plan lacks a thorough consideration of infrastructure, particularly transport. Public transport provisions are unclear, and existing cuts to bus services, especially in Audley, make the council's assumption of a 10% uptake unsound. Studies suggest a 3% uptake is more realistic, especially with no train stations nearby. Furthermore, the transport modelling for site AB2 doesn't appear to align with M6 Junction 16 plans, and consultation with Highways England and neighbouring authorities appears insufficient.</p> <p>4. AB2 Green Belt and Brownfield Land The plan allocates 80 hectares to site AB2, exceeding the 22 hectares required by 58 hectares. Using this Green Belt land, while 22 hectares of brownfield sites are available, is unjustified and inflates housing needs.</p> <p>5. Uncertainty with HS2 Funding and St Modwen's Involvement Assumptions about HS2 funding for the M6 are speculative, and the council is relying on technical support which is based upon unconfirmed assumptions provided by St Modwen. I was also contacted by St Modwen, raising concerns about the integrity of the process and whether proper planning regulations are being followed.</p> <p>6. Lack of Employment Site Development The exclusion of the Peacocks Hay development is concerning, especially as no employment sites have been delivered, which undermines the Borough's economic sustainability. This site would need to have consideration taken towards the housing needs.</p>
<b>Attachments</b>	<a href="#">1341210_CllrRebekahLewis_redacted.pdf</a>
<b>Comment ID</b>	NULLP1157
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Family Name</b>	Lewis
<b>Consultee Given Name</b>	Rebekah
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Response to the Newcastle-under-Lyme Local Plan Regulation 19 Stage</p> <p>Tho whom it may concern,</p> <p>As a Borough Councillor, I wish to formally object to the Newcastle-under-Lyme Local Plan at the Regulation 19 stage. My concerns relate to both procedural flaws and substantive shortcomings in the plan.</p> <p>1. Delay in Supporting Documentation Supporting documents were delayed, giving councillors insufficient time to review them before 24th July 2024 full council vote. This compromised our ability to make informed decisions. This is evidenced by the freedom of information request completed by the Labour group and outlined in their response. I have included the screenshot below (Officer addendum - see attached document).</p> <p>2. Infrastructure and Transport Issues The plan lacks a thorough consideration of infrastructure, particularly transport. Public transport provisions are unclear, and existing cuts to bus services, especially in Audley, make the council's assumption of a 10% uptake unsound. Studies suggest a 3% uptake is more realistic, especially with no train stations nearby. Furthermore, the transport modelling for site AB2 doesn't appear to align with M6 Junction 16 plans, and consultation with Highways England and neighbouring authorities appears insufficient.</p> <p>3. Flawed Consultation Process The website states email responses won't be accepted, contradicting the council's 24th July 2024 decision to allow them. This inconsistency harms public engagement and transparency.</p> <p>4. AB2 Green Belt and Brownfield Land The plan allocates 80 hectares to site AB2, exceeding the 22 hectares required by 58 hectares. Using this Green Belt land, while 22 hectares of brownfield sites are available, is unjustified and inflates housing needs.</p>

	<p>5. Uncertainty with HS2 Funding and St Modwen's Involvement Assumptions about HS2 funding for the M6 are speculative, and the council is relying on technical support which is based upon unconfirmed assumptions provided by St Modwen. I was also contacted by St Modwen, raising concerns about the integrity of the process and whether proper planning regulations are being followed.</p> <p>6. Lack of Employment Site Development The exclusion of the Peacocks Hay development is concerning, especially as no employment sites have been delivered, which undermines the Borough's economic sustainability. This site would need to have consideration taken towards the housing needs.</p> <p>7. Road Plan Soundness and Maintenance There's no clear plan for road adoption and maintenance. Authorities, including (but not limited to) Staffordshire County Council and Highways England, should be approached to clarify responsibility, as this uncertainty impacts the plan's long-term soundness.</p> <p>8. Traffic Survey Discrepancies The council's transport report lacks sufficient evidence. An independent traffic survey by PAPG contradicts many of the assumptions, particularly regarding traffic flow, further questioning the plan's viability. Given these concerns, I urge the council to reconsider the soundness of the plan and ensure that proper procedures are followed.</p>
<b>Attachments</b>	<a href="#">1341210_CllrRebekahLewis_redacted.pdf</a>
<b>Comment ID</b>	NULLP1494
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Lewis
<b>Consultee Given Name</b>	Rebekah
<b>Q6 Details</b>	<p><b>Local Draft Plan</b> <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b> <b>Green Belt - Unsound</b> Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b> Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p>

	<p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>St Chads Primary School has received a letter saying that they will be receiving funding to expand the school. St Chads is a fantastic primary school, but has no space for expansion. The school already has classrooms which are effectively static caravans. These are too hot in the summer, and too cold in the winter. I don't think that correct surveys have been completed in regards to needs for more shops, schools, doctors &amp; dental surgeries along with other infrastructure. There is no evidence base for this and also pre-empting the decision that the planning inspectorate make the agreement that the local plan is sound.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1493
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Lewis
<b>Consultee Given Name</b>	Rebekah
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP782
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	Strategic Objectives of the Borough We are supportive of SO-4 (iv) which seeks to mitigate the impact of climate change. The need to respond to the climate emergency should be a 'golden thread' running through the new local plan.
<b>Comment ID</b>	NULLP790
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	Policy IN1: Infrastructure We welcome criteria 1, 2 and 4 of this policy relating to the delivery of infrastructure especially water and wastewater infrastructure.
<b>Q7 Modification</b>	We request that criterion 10 is expanded as follows: '10. Infrastructure must be provided in a timely and, where appropriate, phased manner to serve the occupants and users of the development. It may be necessary to co-ordinate the timing for the delivery of development with the timing for the delivery of infrastructure. For sites that are proposed for delivery over a number of phases/years, a Phasing and Delivery Strategy will be required to be submitted as part of any planning application.' This reflects the fact that the timing for the delivery of development may not coincide with the timing for the delivery of new infrastructure that is required to accommodate new growth or investment.
<b>Comment ID</b>	NULLP794
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE4
<b>Q6 Details</b>	Policy SE4: Sustainable Drainage Systems We request the following amendments to Policy SE4: '1. Development proposals should manage and discharge surface water through a sustainable drainage system. Smaller developments may be exempt from full Sustainable Drainage Systems (SuDs) implementation but should still apply the surface water hierarchy and incorporate appropriate measures to manage surface water runoff sustainably, such as the use of permeable paving, rain gardens, or soakaways, wherever feasible. 2. Development proposals should prioritise the following approaches for surface water management in this order of preference: a. Infiltration: Discharge of rainwater into the ground through infiltration techniques such as soakaways. b. Attenuated Discharge to a Surface Water Body: Discharge of rainwater to streams, rivers, lakes, canals (with permission), or other surface water features, ensuring minimal impact on flow rates. c. Attenuated Discharge to a Surface Water Sewer, Highway Drain, or another Drainage System, Discharge to existing public surface water drainage systems, but only after exploring infiltration and surface water body discharge options. d. Attenuated Discharge to a Combined Sewer: Discharge to a combined sewer system that collects both surface water and foul sewage (wastewater). This should only be considered as a last resort after exhausting all other options above. Departures from this hierarchy should be fully justified and may require additional mitigation measures.

	<p>3. A foul and surface water SuDS drainage strategy, incorporating SuDS where required, should be submitted with the planning application. This strategy should:</p> <p>Demonstrate a clear understanding of site-specific conditions including soil permeability, groundwater levels, overland flow and exceedance routes, any ephemeral watercourses, and contamination risks (which may influence SuDS suitability).</p> <p>Design SuDS solutions appropriate to the scale and nature of the development, following the surface water hierarchy and prioritising infiltration.</p> <p>Provide calculations for runoff rates, attenuation volumes, and demonstrate how the system will manage storm events up to and including the 1 in 100-year event with climate change allowances.</p> <p>Address the potential impacts of climate change on the long-term performance of SuDS and incorporate adaptation measures, where appropriate.</p> <p>e. Where applications are submitted on land which is part of a wider allocation / development, applicants will be expected to submit allocation/development wide foul and surface water strategies to demonstrate how the site will be brought forward holistically and in a co-ordinated manner.</p> <p>4. Early engagement with the Lead Local Flood Authority (LLFA), Severn Trent and United Utilities is important to explore SuDS feasibility and design. For sites with potential canal discharge, the Canal and Rivers Trust should be consulted.</p> <p>5. SuDS proposals must be integrated with on-site landscaping, prioritise multi-functional SuDS and align with the latest SFRA recommendations, LLFA guidance, and relevant SuDS design standards. The incorporation of surface water management measures and SuDS should commence at the outset of the design process.</p> <p>6. A detailed maintenance plan for the approved SuDS system should be submitted, addressing ongoing responsibility, inspection regimes, and funding mechanisms for the SuDS lifespan.</p> <p>7. The maintenance plan should outline the long-term funding mechanism for the SuDS scheme and the management arrangements and maintenance plan for any on-site riparian watercourses. Options may include:</p> <p>a.</p> <p>Establishment of a dedicated management company. This company would be responsible for ongoing maintenance, funded through service charges levied on residents or businesses within the development.</p> <p>b.</p> <p>Community-based stewardship: explore opportunities for community involvement in SuDS maintenance, such as volunteer groups or partnerships with local organisations.</p> <p>c.</p> <p>Financial contributions from developers: Developers may be required to provide financial contributions towards the long-term maintenance of the SuDS, secured through planning obligations or a sinking fund.</p> <p>d.</p> <p>Pumped drainage systems should be minimised. Proposals should prioritise gravity-based, naturally functioning SuDS solutions wherever possible.'</p>
<b>Comment ID</b>	NULLP788
<b>Order</b>	58
<b>Title</b>	Policy HOU8: Rural and First Homes Exception Sites
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU8
<b>Q6 Details</b>	<p>Policy HOU8: Rural and First Homes Exception Sites</p> <p>We are supportive of criterion 1b of this policy which identifies the need for rural and first home exception sites to relate to the scale and location of the existing settlement.</p>
<b>Comment ID</b>	NULLP792
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q7 Modification</b>	<p>To reflect the fact that there may be a wider range of impact assessments required, we request that criterion g of this policy is amended as follows:</p> <p>'g. Under the agent of change principle, if new development or uses are to be introduced near a preexisting business, it is the responsibility of the developer to assess the impact and ensure solutions to address and mitigate any amenity issues such as noise, odour, vibration, and/or light are put forward as part of proposals.'</p> <p>We also suggest that the explanatory text is expanded to state that:</p> <p>'The approach to any impact assessments must be agreed in writing with the local planning authority and in consultation with the relevant affected business / operation.'</p>



<b>Comment ID</b>	NULLP796
<b>Order</b>	123
<b>Title</b>	Policy SE12: Amenity
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyskens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE12
<b>Q7 Modification</b>	<p>Policy SE12: Amenity</p> <p>We request that criterion 2 is amended to include reference to other impact assessments such as odour and vibration. Our amended wording is below:</p> <p>'New development should effectively integrate with existing uses, and existing businesses and community facilities must not have unreasonable restrictions placed on them as a result of new development. Where the operation of an existing business or facility could have a significant adverse effect on a proposed new development in its vicinity, the applicant (developer) should provide a suitable assessment, such as a noise, vibration and odour impact assessments or a light pollution study, to demonstrate the following.'</p>
<b>Comment ID</b>	NULLP800
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyskens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q7 Modification</b>	<p>Policy SA1: General Requirements</p> <p>Table 6 Site Allocation Requirements</p> <p>We request the following amendments to Table 6:</p> <p>In that section which refers to Masterplans, we request the following additional point:</p> <ul style="list-style-type: none"> <li>• 'The masterplan must include a site-wide and holistic strategy for foul and surface water management. It shall identify land at the site that ensures the delivery of multi-functional sustainable drainage that is integrated with the landscaped environment and delivered in accordance with the four pillars of sustainable drainage'</li> </ul> <p>For consistency with our recommended amends to Policy SE12, which identify a wider range of impact assessments that may be necessary to address the agent of change principle, we request the following amendment to that section of Table 6 which addresses Amenity:</p> <ul style="list-style-type: none"> <li>• 'Where relevant, noise appropriate impact assessments and or light pollution studies will be undertaken, and appropriate mitigation delivered in accordance with Policy SE12.'</li> </ul> <p>In that section that addresses Flood Risk, the wording in the first row of the first column should be amended to state:</p> <p>'Flood Risk Assessments / Foul and Surface Water Drainage Strategies.'</p> <p>In the same row, the first bullet point should be amended to state:</p> <ul style="list-style-type: none"> <li>• 'Developments will be required to undertake Flood Risk Assessments and prepare Foul and Surface Water Drainage Strategies using the latest Strategic Flood Risk Assessment or latest Environment Agency mapping (in accordance with guidance from the Council and the Lead Local Flood Authority) and the requirements of Policy SE3.'</li> </ul> <p>In that Section that relates to Utilities, we request that the row which is labelled as Water Mains is amended to be named:</p> <p>'Water mains and Sewers'</p> <p>We also request the following amendment to the associated wording:</p> <p>'Where water mains and / or sewers cross a development site an assessment of location, condition and status will be required to inform an appropriate strategy regarding easements or diversion. Applicants should not assume that assets can be diverted or that levels can change on top of water mains and sewers. Where sewers exist, early dialogue should take place with the relevant wastewater undertaker to confirm any risk of sewer flooding.'</p>
<b>Comment ID</b>	NULLP785
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyskens

<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q7 Modification</b>	<p>Policy CRE1: Climate Change</p> <p>We request that criterion 2 and 3 are amended as follows:</p> <p>'2. Non-domestic developments should must be designed to meet the BREEAM 'Excellent Standard', including in respect of water efficiency, unless demonstrated as not feasible or viable. Where the 'Excellent Standard' cannot be achieved, evidence must be submitted to demonstrate why the standard cannot be complied with. The BREEAM 'very good' standard must be met as a minimum. Proposals should aim to achieve BREEAM Outstanding Standard (as updated) and will be afforded positive weight where this is achieved.</p> <p>3. All residential development proposals should seek to reduce the use of mains water through adoption of water saving measures, fittings and appliances. Residential developments should must be designed to achieve a maximum of 110 litres per person per day, in line with the optional standard for water efficiency in of Building Regulations, Part G.'</p>
<b>Comment ID</b>	NULLP789
<b>Order</b>	60
<b>Title</b>	Policy HOU9: Community Led Exception Sites
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU9
<b>Q6 Details</b>	<p>Policy HOU9: Community Led Exception Sites</p> <p>We are supportive of criterion 1c of this policy which identifies the need for community led exception sites to relate to the scale and location of the existing settlement.</p>
<b>Comment ID</b>	NULLP793
<b>Order</b>	105
<b>Title</b>	Policy SE3: Flood Risk Management
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE3
<b>Q7 Modification</b>	<p>We suggest that criterion 1 is updated as follows.</p> <p>'1. All development should follow the sequential approach to determining the suitability of land for development, direct new development to areas at lowest risk of flooding and where necessary apply the exception test, taking account of all sources of flooding identified in the Strategic Flood Risk Assessment.'</p> <p>We have requested the above change to reflect the fact that new sources of flood risk information may become available during the life of a plan which may not be accounted for in the latest strategic flood risk assessment. For example, a storm event or more up-to-date modelling information.</p>
<b>Comment ID</b>	NULLP797
<b>Order</b>	127
<b>Title</b>	Policy SE14: Green and Blue Infrastructure
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE14
<b>Q6 Details</b>	<p>Policy SE14: Green and Blue Infrastructure</p> <p>We are supportive of criterion 1 which identifies the need to incorporate multi-functional green and blue infrastructure elements as an integral part of the design from the outset.</p>
<b>Comment ID</b>	NULLP801
<b>Order</b>	8
<b>Number</b>	2

<b>Title</b>	Introduction
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q6 Details</b>	<p>Thank you for your consultation seeking the views of United Utilities Water Limited (U UW) as part of the Local Plan process. For confirmation, U UW has welcomed the meaningful dialogue to date and wishes to confirm no objection to the proposed local plan.</p> <p>U UW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:</p> <ul style="list-style-type: none"> <li>-ensure a strong connection between development and infrastructure planning;</li> <li>-deliver sound planning strategies; and</li> <li>-inform our future infrastructure investment submissions for determination by our regulator.</li> </ul> <p>U UW wishes to highlight the benefit of early, constructive communication with the Council and site promoters to ensure a co-ordinated approach to the delivery of sustainable growth in sustainable locations. When preparing the local plan, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.</p> <p>We encourage you to direct future developers to our free pre-application service to discuss their schemes and highlight any potential issues by contacting:</p> <p>Developer Services – Wastewater Tel: 03456 723 723 Email: SewerAdoptions@uuplc.co.uk</p> <p>Developer Services – Water Tel: 0345 072 6067 Email: DeveloperServicesWater@uuplc.co.uk</p> <p>We have undertaken an initial site assessment of the sites included in the shp files that were provided to us for assessment. As agreed in my email exchange with Allan Clarke on 7th October, we will provide additional comment on the site allocations and the associated policy wording by the end of the week. This will include suggested amendments to the allocation policies to take account of any site-specific concerns identified by U UW.</p> <p>In the interim, the remainder of this letter, sets out our initial comments on the wider non-site specific policies of the plan.</p> <p>As noted above, with regards to the policies relating to the site-specific allocations, we will provide additional detailed comment on the proposed policies by separate cover and before the end of this week. We are grateful for this additional time.</p> <p>Moving forward, we respectfully request that the Council continues to consult with U UW for all future planning documents.</p>
<b>Comment ID</b>	NULLP783
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	We welcome the council's emphasis on design. We request that this policy includes an additional specific criterion relating to sustainable water management principles.
<b>Q7 Modification</b>	<p>We request that an additional 12th criterion is included as follows:</p> <p>'At the outset of the design process, development proposals will be required to embrace sustainable water management principles through the application of the surface water hierarchy; making space for high quality sustainable drainage systems (SuDS) through their integration with landscaping and the wider green and blue environment; and the incorporation of water efficiency measures.'</p>
<b>Comment ID</b>	NULLP787
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU6

<b>Q6 Details</b>	Policy HOU6: Self Build and Custom Dwellings We are supportive of criterion 3 of this policy which refers to the need for a comprehensive consideration of infrastructure provision on multiple self-build sites.
<b>Comment ID</b>	NULLP791
<b>Order</b>	98
<b>Title</b>	Policy IN7 Utilities
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN7
<b>Q7 Modification</b>	Policy IN7: Utilities As per our recommended amendment to Policy IN1, we request that criterion 1 of this policy is expanded as follows: 'Development proposals should demonstrate sufficient existing infrastructure capacity for surface water disposal, water supply, wastewater treatment, telecommunications, gas and electricity, highways, social and green infrastructure to meet forecast demands arising from them and that appropriate connections can be made. It may be necessary to co-ordinate the timing for the delivery of development with the timing for the delivery of infrastructure.'
<b>Comment ID</b>	NULLP795
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE7
<b>Q6 Details</b>	Policy SE7: Biodiversity Net Gain We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers. On-site provision may not be the most appropriate long term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. This approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. It states: 'When assessing opportunities and proposals to secure biodiversity net gain, the local planning authority will need to have regard to all relevant policies, especially those on open space, health, green infrastructure, Green Belt and landscape. It will also be important to consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change, and supported by appropriate maintenance arrangements. Paragraph: 023 Reference ID: 8-023-20190721 Revision date: 21 07 2019'
<b>Q7 Modification</b>	Therefore for consistency with Paragraph: 023 Reference ID: 8-023-20190721, we request that the following additional criterion is added to this policy: '5. Consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change.'
<b>Comment ID</b>	NULLP1040
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15

<b>Q6 Details</b>	<p>Policy AB15 Land North of Vernon Avenue</p> <p>We request that criterion 8 is amended as follows:</p> <p>'8. Development layout will consider proximity to sewers within the site and adjacent to the boundaries of the site and provide for access for maintenance, repair and replacement and appropriate offset distances away from such the assets.'</p> <p>We request that paragraph 13.43 is amended to take account of records of sewer flooding having occurred in the wider area.</p> <p>'13.43 The site is located within Flood Zone 1 but some areas within the site are affected by surface water flooding. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk. There are flood incidents from the public sewer in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. Any risk of sewer flooding could affect the developable area of the site and the detail of the design. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1044
<b>Order</b>	193
<b>Title</b>	Madeley and Betley
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Madeley High School Extension
<b>Q6 Details</b>	<p>Madeley High School Extension (Policy MD29 Land North of Bar Hill, Madeley)</p> <p>We note that the shp files sent for our assessment include land adjacent to Madeley High School for a potential extension. This is referenced in Policy MD29. From our review of the draft local plan there is no specific policy which directly addresses the potential extension of the high school. We wish to note that there is a public sewer that passes through the site and therefore we recommend that a site-specific policy is included which includes the following criterion:</p> <p>'Development layout will consider proximity to the sewer within the site and provide for access for maintenance, repair and replacement, and appropriate offset distances from the assets. Applicants must not assume that the sewer can be diverted.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1048
<b>Order</b>	213
<b>Title</b>	Talke and Butt Lane
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RC8
<b>Q6 Details</b>	<p><b>Site Ref RC8 Land at Liverpool Road, Kidsgrove</b></p> <p>Within the shp files you have provided to us for our assessment, we note the inclusion of the above site which appears to be a site that is already consented. See Appendix 4: Commitments since 31 March 2023.</p> <p>For completeness, we wish to note that this site is in a location where sewer flooding incidents have occurred in the wider vicinity. As such, if this site is formally allocated, we would recommend the following policy wording:</p> <p>'There are flood incidents from the public sewer in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.</p> <p>We would also recommend following explanatory text:</p> <p>'Applicants must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development</p>

	would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1039
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q7 Modification</b>	<p>Policy AB12 Land East of Diglake Street</p> <p>We request that an additional criterion is added to this policy which states:</p> <p>'All development being located an appropriate distance from the sewers that run through the site with appropriate access for repair, maintenance and replacement.'</p> <p>In respect of this site, we wish to note that there is a record of modelled sewer flood risk. As such we request that paragraph 13.32 is amended as follows:</p> <p>'13.32 The site is located within Flood Zone 1 but some areas within the site are affected by surface water flooding and at risk of flooding from the public sewer. Two sewers also run through the site adjacent to its western boundary. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. Applicants should engage with the relevant provider to consider the detailed design of the site and drainage details and ensure that development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and local plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. The risk of sewer flooding could affect the developable area of the site and the detail of the design. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1043
<b>Order</b>	177
<b>Title</b>	Site G&T 11 Land at Hardings Wood Road, Kidsgrove
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	G+T Site 11
<b>Q6 Details</b>	<p><b>Site G&amp;T 11 Land at Hardings Wood Road, Kidsgrove</b></p> <p>We wish to note that this site is the location for a number of large diameter sewers which are located on the western boundary of the site. Access to these sewers must be maintained and the layout of any pitches for this site must provide appropriate stand off distances away from these assets. As such we recommend the following wording:</p> <p>'The layout of development at the site must consider proximity to sewers within the site, and adjacent to the boundaries of the site and provide for access and appropriate distances away from such assets to allow for maintenance, repair and replacement. The location of any plots, built development or storage of materials or vehicles within the off-set distance for these assets will not be acceptable.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>



<b>Comment ID</b>	NULLP1047
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10
<b>Q6 Details</b>	<p>Policy TK10 Land at Crown Bank, Talke and Butt Lane</p> <p>We wish to note that this site is the location for a large pressurised sewer and a sewer identified as no longer in use. Access to the sewer must be maintained and the layout must provide appropriate stand-off distances away from the assets. The status of the sewer identified as no longer in use should be confirmed. As such we recommend the following additional criterion.</p> <p>'The layout of development at the site must consider proximity to sewers within the site, and adjacent to the boundaries of the site, and provide for access and appropriate offset distances away from the sewers to allow for maintenance, repair and replacement. The status of the sewer identified as no longer in use requires confirmation with United Utilities. Applicants should not assume that the sewer can be diverted or that any levels can change on top of the sewer.'</p> <p>We also recommend the following additional explanatory text.</p> <p>'This site is the location for a large pressurised sewer and a sewer identified as no longer in use which are located within the site and need careful consideration in the layout and in liaison with United Utilities.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1038
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>AB2 Land at Junction 16 of M6</p> <p>Within our initial assessment of sites at the First Draft stage of the local plan, UU identified a number of sites which are on the periphery of the area of operation of United Utilities, i.e., they are at a location which is in between the area operated by United Utilities and another water company. These sites are large sites where further clarity on the point of connection will be required to determine if the applicant will connect to infrastructure owned and operated by United Utilities or Severn Trent. We highlighted concerns in respect of Site AB2. It is imperative that site promoters ensure that the points of connection for wastewater and clean water supply are agreed and to ensure that any necessary upgrades to infrastructure are coordinated with the delivery of development. We request that this is addressed in your site-specific requirements. As a result, we request that you amend criterion 19 as follows:</p> <p>19. An allocation wide utilities masterplan being prepared for the site which details matters including foul, and surface water drainage, and public water supply. It may be necessary to co-ordinate the delivery of the development with the timing for delivery of appropriate infrastructure.</p> <p>We also suggest the following explanatory text:</p> <p>This site is located adjacent to the motorway, away from existing utilities and on the periphery of operation of different water and wastewater undertakers. As such, early dialogue is required to prepare a site wide utilities masterplan, which is critical to ensure a co-ordinated approach to the delivery of development with necessary utilities infrastructure.</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1042
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>CT 1 Land at Red Street and High Carr Farm, Chesterton</b></p> <p>For CT1, please refer to the same comments as per site AB2, i.e., the site is located on the periphery of operation of United Utilities and Severn Trent. As such we request that you include an additional criterion as follows:</p> <p>'An allocation wide utilities masterplan being prepared for the site which details matters including foul, surface water drainage, and public water supply. It may be necessary to co-ordinate the delivery of the development with the timing for delivery of appropriate infrastructure.'</p> <p>We also suggest the following explanatory text:</p> <p>'This site is located away from existing utilities and on the periphery of operation of different water and wastewater undertakers. As such, early dialogue is required to prepare a site wide utilities masterplan, which is critical to ensure a co-ordinated approach to the delivery of development with necessary utilities infrastructure.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1046
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>Policy BL18 Land at Clough Hall</p> <p>We request that the following criterion is added to this policy:</p> <p>'Development layout will consider proximity to the sewers within and adjacent to the site and provide for access for maintenance, repair and replacement, and appropriate offset distances from the assets.'</p> <p>We request that criterion 4 is amended as follows:</p> <p>'4. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding and sewer flooding;'</p> <p>We also recommend the following amendments to paragraph 13.205 and 13.206.</p> <p>'13.205 Parts of the site are affected by surface water flooding. A sequential approach will be taken within the site to direct development to areas of lowest flood risk. There are sewers present on / adjacent to the site, which are identified as at risk of flooding. There are also records of flooding incidents in the wider area. The sewers and the risk of flooding from them will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details and ensure that development is not located in an area at risk of flooding from the public sewer. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. Any risk of sewer flooding could affect the developable area of the site and the detail of the design. Applicants should consider site topography and any exceedance flow paths. Careful consideration will need to be given to the site topography and the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; overland flow paths and the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk.'</p> <p>13.206 The site is located in an area that was previously subject to mining operations. Appropriate land contamination studies and coal mining assessments will be required to support the appropriate delivery of the site. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. Applicants should engage with the relevant provider to consider the detailed design of the site and drainage details. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk.'</p>
<b>Q10 File 1</b>	6390569
<b>Attachments</b>	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
<b>Comment ID</b>	NULLP1041
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Company / Organisation</b>	United Utilities
<b>Consultee Family Name</b>	Leyssens

Consultee Given Name	Andrew
Q4 Part of document	Policy
Q4 Policy	AB33
Q7 Modification	<p><b>Policy AB33 Land off Nantwich Road / Park Lane, Audley</b></p> <p>We request that criterion 7 is amended to take account of records of sewer flooding having occurred in the wider area and the fact that sewers pass through the site.</p> <p>'7. A sequential approach will be taken within the site to direct development to areas of least risk of flooding, taking account flood risk from all sources including surface water flooding and sewer flood risk,'</p> <p>We also request amendment to paragraph 13.43:</p> <p>'13.43 The site is located within Flood Zone 1 but some areas within the site are affected by surface water flooding. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk. There are flood incidents from the public sewer in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. Any risk of sewer flooding could affect the developable area of the site and the detail of the design. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>
Q10 File 1	6390569
Attachments	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
Comment ID	NULLP1045
Order	199
Title	Policy NC13 Land West of Bullockhouse Road, Harriseahead
Consultee Company / Organisation	United Utilities
Consultee Family Name	Leyssens
Consultee Given Name	Andrew
Q4 Part of document	Policy
Q4 Policy	NC13
Q6 Details	<p><b>Policy NC13 Land West of Bullockhouse Road, Harriseahead</b></p> <p>There are a range of sewers on this site and therefore we request that an additional criterion is added to this policy as follows.</p> <p>'Development layout will consider proximity to the sewer within the site and provide for access for maintenance, repair and replacement, and appropriate offset distances from the assets. Applicants must not assume that the sewer can be diverted.'</p> <p>We also request the following amendment to criterion 5:</p> <p>'5. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account of flood risk from all sources including surface water flooding and sewer flood risk,'</p> <p>We request the following amendment to paragraph 13.162:</p> <p>13.162 There are a range of sewers on or close to the site which are identified as at risk of flooding. There are also records of flooding incidents in the wider area. This The sewers and the risk of flooding from them will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. Applicants <del>should</del> must engage with the relevant provider United Utilities to consider the detailed design of the site and drainage details. to ensure that development is not located in an area at risk of flooding from the public sewer. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that the sewers can be diverted, or that any levels can change on top of the sewers, as such proposals can negatively affect hydraulic performance and increase or displace flood risk. Any risk of sewer flooding could affect the developable area of the site and the detail of the design. Applicants <del>should consider site topography and any exceedance flow paths</del>. Careful consideration will need to be given to site topography and the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; overland flow paths and the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge. Resultant layouts and levels should take account of such existing circumstances. In accordance with national and Local Plan policy, an effective drainage strategy will be established, and a sequential approach applied within the site directing development to areas of lowest flood risk.'</p>
Q10 File 1	6390569
Attachments	<a href="#">1308730 Andrew Leyssens- REDACTED.pdf</a>
Comment ID	NULLP1049
Order	106
Title	Supporting Information

<b>Consultee Company / Organisation</b>	United Utilities																				
<b>Consultee Family Name</b>	Leysens																				
<b>Consultee Given Name</b>	Andrew																				
<b>Q6 Details</b>	<p><b>Strategic Flood Risk Assessment</b></p> <p>We have reviewed the submitted strategic flood risk assessment (SFRA). We are concerned that this does not fully reflect the sewer flood risks we have identified above. Specifically, we request that the SFRA is updated to identify a modelled risk of sewer flooding at the following sites:</p> <table> <tr> <td>Site Ref</td><td>Site Name</td></tr> <tr> <td>AB12</td><td>Land East of Diglake Street</td></tr> <tr> <td>NC13</td><td>Land West of Bullockhouse Road, Harriseahead</td></tr> <tr> <td>BL18</td><td>Land at Clough Hall</td></tr> </table> <p>We also request that the SFRA is updated to confirm that there are hydraulic flooding incidents from the public sewer in the wider vicinity of the following sites:</p> <table> <tr> <td>Site Ref</td><td>Site Name</td></tr> <tr> <td>AB15</td><td>Land north of Vernon Avenue</td></tr> <tr> <td>AB33</td><td>Land off Nantwich Road / Park Lane, Audley</td></tr> <tr> <td>NC13</td><td>Land West of Bullockhouse Road, Harriseahead</td></tr> <tr> <td>BL18</td><td>Land at Clough Hall</td></tr> <tr> <td>RC8</td><td>Land at Liverpool Road, Kidsgrove</td></tr> </table> <p>These matters will need careful consideration in accordance with the above amendments to policy and explanatory text. It is important that these flood risks are reflected in the SFRA in accordance with Planning Practice Guidance.</p>	Site Ref	Site Name	AB12	Land East of Diglake Street	NC13	Land West of Bullockhouse Road, Harriseahead	BL18	Land at Clough Hall	Site Ref	Site Name	AB15	Land north of Vernon Avenue	AB33	Land off Nantwich Road / Park Lane, Audley	NC13	Land West of Bullockhouse Road, Harriseahead	BL18	Land at Clough Hall	RC8	Land at Liverpool Road, Kidsgrove
Site Ref	Site Name																				
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AB33	Land off Nantwich Road / Park Lane, Audley																				
NC13	Land West of Bullockhouse Road, Harriseahead																				
BL18	Land at Clough Hall																				
RC8	Land at Liverpool Road, Kidsgrove																				

<b>Comment ID</b>	NULLP329
<b>Order</b>	103
<b>Title</b>	Policy SE2: Land Contamination
<b>Consultee Company / Organisation</b>	The Coal Authority
<b>Consultee Position</b>	Principal Planning & Development Manager
<b>Consultee Family Name</b>	Lindsley
<b>Consultee Given Name</b>	Melanie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy SE2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The Coal Authority supports the inclusion of this policy which identifies that a Coal Mining Risk Assessment should support development proposals where past coal mining activity may pose a risk to surface stability and public safety.</p> <p>We previous requested that the wording be amended to state Development High Risk Area rather than referral area to be consistent with our published guidance and to make it easier for applicants to understand the process without causing confusion. We still consider that this request is valid.</p>
<b>Q7 Modification</b>	<p>In all publications, and in our consultations responses, we refer to what was previously the referral area as the Development High Risk Area. It may help with clarity and consistency if reference to the Coal Mining Referral Area was amended to say the following:</p> <p>All applications which fall within <u>the Coal Authority defined Development High Risk Area</u>, unless on the Coal Authority's Exemptions List, should prepare a coal mining risk assessment to identify and mitigate any risks from the legacy of coal mining in the area.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP455
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Livingston
<b>Consultee Given Name</b>	Susanna
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Policy AB12 Land East of Diglake Street</p> <p>I think this policy is unsound due to a variety of reasons.</p> <ol style="list-style-type: none"> <li>1. The main access route planned at the bottom of Diglake Street could possibly mean there are up to 250 extra vehicles journeying up and down the street at peak times. This street is already very difficult to traverse at peak times and often cars have to reverse and wait for vehicles to pass.</li> <li>2. This would be building on greenbelt site. Are there not lots of empty properties and brownbelt sites in the area which could be used?</li> <li>3. It is already dangerous when exiting Diglake Street onto the Main Street as cars are often parked close to the corners, meaning cars have to pull right out onto the main street to be able to see them.</li> <li>4. The school has not got capacity for extra children from 125 houses.</li> <li>5. The main street through Bignall End again is already dangerous with parked cars on both sides, resulting in one way traffic and a queue to go the other way.</li> <li>6. This area is known for the Wedgewood Monument which can be viewed easily from one side of Diglake street and the countryside views are why some people wanted to live here. This will block views and take more of the countryside which is where a lot of local people enjoy relaxing, walking, taking dogs out, and playing.</li> <li>7. This would be dangerous as on Diglake Street, cars park on both sides of the street, making it single passageway through and with children or any pedestrians crossing the street, this makes it extra dangerous.</li> </ol> <p>I would like the planning inspector to remove the sites from the Local Plan.</p>
<b>Comment ID</b>	NULLP454
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Livingston
<b>Consultee Given Name</b>	Susanna
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Policy AB2 and Land at the junction 16 of M6</p> <p>I think the policy is unsound for a variety of reasons.</p> <ol style="list-style-type: none"> <li>1 The traffic around this area is often already clogged at rush hour times and adding more commuters would only exacerbate this.</li> <li>2 There are not good enough transport links to and from this area to allow people to use public transport.</li> <li>3 It is an area that is often flooded.</li> </ol> <p>I would like the planning inspector to remove the sites from the Local Plan.</p>



<b>Comment ID</b>	NULLP19
<b>Order</b>	202
<b>Title</b>	Policy SP2 Cheddar Drive, Silverdale
<b>Consultee Family Name</b>	Lomax
<b>Consultee Given Name</b>	C. T
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP2
<b>Q6 Details</b>	I strongly object to the building of 1100 houses in Silverdale. The infer structure can not cope, I live in Silverdale now in (redacted by admin) and the traffic pollution that will be generated and the on going landfill toxic gases being emitted. The Doctors and dentist can not cope now so how is going to cope with the extra influx of people. ?? It's bonkers without proper thought about the impact on local people.
<b>Comment ID</b>	NULLP20
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Lomax
<b>Consultee Given Name</b>	C. T
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	I strongly object to the building of 1100 houses in Silverdale. The infer structure can not cope, I live in Silverdale now in (redacted by admin) and the traffic pollution that will be generated and the on going landfill toxic gases being emitted. The Doctors and dentist can not cope now so how is going to cope with the extra influx of people. ?? It's bonkers without proper thought about the impact on local people.
<b>Comment ID</b>	NULLP21
<b>Order</b>	207
<b>Title</b>	Policy SP22 Former Playground off Ash Grove, Silverdale
<b>Consultee Family Name</b>	Lomax
<b>Consultee Given Name</b>	C. T
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP22
<b>Q6 Details</b>	I strongly object to the building of 1100 houses in Silverdale. The infer structure can not cope, I live in Silverdale now in (redacted by admin) and the traffic pollution that will be generated and the on going landfill toxic gases being emitted. The Doctors and dentist can not cope now so how is going to cope with the extra influx of people. ?? It's bonkers without proper thought about the impact on local people.
<b>Comment ID</b>	NULLP22
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Lomax
<b>Consultee Given Name</b>	C. T
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	I strongly object to the building of 1100 houses in Silverdale. The infer structure can not cope, I live in Silverdale now in (redacted by admin) and the traffic pollution that will be generated and the on going landfill toxic gases being emitted. The Doctors and dentist can not cope now so how is going to cope with the extra influx of people. ?? It's bonkers without proper thought about the impact on local people.

<b>Comment ID</b>	NULLP588
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Lovatt
<b>Consultee Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p><b>RE: Local Plan AB33- off Park Lane</b></p> <p>I wish to object to the above policy as it is unsound for the following reasons:</p> <p>Firstly the roads and traffic in the area is already ridiculously high for what should be a <b>rural</b> area. Only recently local residents did a car count in which was recorded within in a 2 hour period between 1300 and 1800 vehicles here alone on the Alsager road outside of my property.</p> <p>Only recently we have had a number of accidents on A500 which has also impacted on the amount of vehicles having to use the road because of the A500 being closed off for 12 hours. To which at one point a huge trailer was blocking the roundabout and and reversing back on it making it dangerous whilst some cars were still trying to pass it (of <b>which I HAVE ON CAMERA</b>).</p> <p>Secondly, the infrastructure in the area is already unsuitable for the proposed more houses. The drains/sewers are insufficient at present and are not coping with the amount of rainfall/surface water. Proof of which I have, since the property I live in has experienced for the past 8 years.</p> <p>The sewers are not big enough as stated by united utilities at present to cope with the amount of rainfall (that's why we have drainage issues at this property still).</p> <p>Having spoken with workers previously at united utilities they have stated they will not refuse new builds being added into the drains as it is REVENUE and the drains are NOT big enough at present without new builds being added to them.</p> <p>AB33 land for the past number of years has been holding water and flooding. Something which it has never done before and climate change and the amount of rainfall we are now experiencing is the result of this.</p> <p>Adding more houses to this area will only increase our already under pressure drains and roads which are already at breaking point. Just because the Council own and have earmarked this ground for possible building does not mean it is suitable and the residents in the area are the ones who should be listened to and not the so called councillors/planners. Our concerns are justified and rightly so, we live in the area and they DO NOT this is something that we are having to manage with every day.</p> <p>Thirdly, the land at AB33 is also part of Pear Tree farm which is classed as a starter farm owned by Staffordshire Council and has been for a number of years. It is standing <b>empty</b> not being used as it should as a business housing a family and contributing to the area. Farmers are an important role in England for our future especially as around the world we are unsure of what is to come. We should be supporting them not selling off parts of the farm bit by bit.</p> <p>Our local primary and secondary school are already bursting and our small village of a few shops/post office cannot cope with the amount of vehicles they contend with. Plus lack of parking in the area, 1 GP surgery in the area and a dentist which at present is not accepting patients.</p> <p>Building more houses in the area will change the area putting more vehicles on our roads, changing the landscape, more light pollution (which is affecting our nocturnal nightlife already) and put more pressures on our sewers and risk more flooding.</p> <p><b>We cannot afford to lose the farming area and greenbelt here, it is crucial we do not exacerbate the problems the area already is experiencing</b></p> <p>Therefore the above site (AB33) needs to be removed to make the Local Plan sound.</p>

Comment ID	NULLP587
Order	153
Title	Policy AB33 Land off Nantwich Road / Park Lane, Audley
Consultee Family Name	Lovatt
Consultee Given Name	Tracy
Q4 Part of document	Policy
Q4 Policy	AB33
Q6 Details	<p>Dear sirs</p> <p><b>RE: Local Plan AB33- off Park Lane</b></p> <p>I wish to object to the above policy as it is unsound for the following reasons:</p> <p>Firstly the roads and traffic in the area is already ridiculously high for what should be a <b>rural</b> area. Only recently local residents did a car count in which was recorded within in a 2 hour period between 1300 and 1800 vehicles here alone on the Alsager road outside of my property.</p> <p>Only recently we have had a number of accidents on A500 which has also impacted on the amount of vehicles having to use the road because of the A500 being closed off for 12 hours. To which at one point a huge trailer was blocking the roundabout and reversing back on it making it dangerous whilst some cars were still trying to pass it (of <b>which I HAVE ON CAMERA</b>).</p> <p>Secondly, the infrastructure in the area is already unsuitable for the proposed more houses. The drains/sewers are insufficient at present and are not coping with the amount of rainfall/surface water. Proof of which I have, since the property I live in has experienced for the past 8 years.</p> <p>The sewers are not big enough as stated by united utilities at present to cope with the amount of rainfall</p>

(that's why we have drainage issues at this property still).

Having spoken with workers previously at united utilities they have stated they will not refuse new builds being added into the drains as it is REVENUE and the drains are NOT big enough at present without new builds being added to them.

AB33 land for the past number of years has been holding water and flooding. Something which it has never done before and climate change and the amount of rainfall we are now experiencing is the result of this.

Adding more houses to this area will only increase our already under pressure drains and roads which are already at breaking point. Just because the Council own and have earmarked this ground for possible building does not mean it is suitable and the residents in the area are the ones who should be listened to and not the so called councillors/planners. Our concerns are justified and rightly so, we live in the area and they DO NOT this is something that we are having to manage with every day.

Thirdly, the land at AB33 is also part of Pear Tree farm which is classed as a starter farm owned by Staffordshire Council and has been for a number of years. It is standing **empty** not being used as it should as a business housing a family and contributing to the area. Farmers are an important role in England for our future especially as around the world we are unsure of what is to come. We should be supporting them not selling off parts of the farm bit by bit.

Our local primary and secondary school are already bursting and our small village of a few shops/post office cannot cope with the amount of vehicles they contend with. Plus lack of parking in the area, 1 GP

surgery in the area and a dentist which at present is not accepting patients.

Building more houses in the area will change the area putting more vehicles on our roads, changing the landscape, more light pollution (which is affecting our nocturnal nightlife already) and put more pressures on our sewers and risk more flooding.

**We cannot afford to lose the farming area and greenbelt here, it is crucial we do not exacerbate the problems the area already is experiencing**

Therefore the above site (AB33) needs to be removed to make the Local Plan sound.

<b>Comment ID</b>	NULLP938
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Lovatt
<b>Consultee Given Name</b>	Tracy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I wish to object to the above policy as it is unsound for the following reasons:</p> <p>Firstly the amount of land which is being earmarked for warehousing is not justified for the area. This build is not for local good but to bring in more people/vehicles from outside the area. Commuting on the M6 and A500 is already busy enough without this addition, encouraging more outside area travel. This is an already very busy stretch of road which unfortunately has been seen to have a number of vehicle accident/incidents even deaths. When this occurs it then adds pressure to the local roads which are at present experiencing a high volume of traffic.</p> <p>This vast amount of greenbelt which AB2 proposes to accomodate is outrageous and environmentally unsound. The loss of habitat and wildlife in the area in exchange for pollution, noise, and an accident waiting to happen is incomprehensible.</p>
<b>Q7 Modification</b>	The above site (AB2) needs to be removed to make the Local Plan sound.



<b>Comment ID</b>	NULLP1193
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>ED 005- Rural Area Topic paper</p> <p>This document is used to support policy PSD2 and PSD3 and is fundamentally flawed in a number of respects.</p> <p>Firstly, in relation to Public Transport, which requires that a "commutable bus service" is available solely to enable residents to access Newcastle Town Centre during what is described as "standard working hours" of 9 am to 5 pm. This fails to recognise the changing nature of work, in that far fewer jobs have "standard hours" of 9-5, for example, retail work or shift work and this is therefore an inappropriate criterion for a bus service to be "commutable".</p> <p>This criterion also ignores Saturday and Sunday working patterns which are, in the 21st century, much more prevalent, and frequently bus services are not available on those days, or significantly less frequent. It also makes the assumption that people in rural communities will only travel to Newcastle for work - it fails to recognise that people living in certain rural communities will almost certainly be working outside the Borough, or will need to travel onwards from the town centre to their place of work (for example in Stoke) and using the definition in the topic paper gives a false impression of sustainability in terms of public transport. It's a lazy definition, with no rational basis for its adoption.</p> <p>Secondly, by limiting the public transport criterion solely to work, the paper completely ignores the need for children and young people to attend colleges at appropriate times, fails to recognise needs for travel for social or leisure activities and even shopping, and completely ignores the need for travel to hospitals or other healthcare settings beyond GP practices.</p> <p>By failing to recognise these needs, the policy fails to support sustainable rural community access to essential facilities that enable them to live in rural communities.</p> <p>In addition to that, the paper fails to differentiate between healthcare facilities - making the erroneous assumption that a pharmacy and a GP surgery are in some way equivalent. Residents who need access to primary care services are unlikely to be able to receive them from a pharmacy and patients who need a pharmacy are unlikely to be able to access those facilities in a GP surgery.</p> <p>The paper fails to recognise that patients need to be able to physically access healthcare facilities and that (for example) the GP surgery in Ashley is not walkable safely from Loggerheads, and the public transport available seriously limits the times at which patients could attend.</p> <p>The topic paper fails to recognise the additional costs of living in rural communities which lack suitable essential infrastructure and these additional costs directly impact on (among other things) the takeup of affordable housing - in particular social rented housing.</p> <p>The fact that this flawed paper is referenced in support of policies PSD2 and PSD3 renders those policies less sound than they would otherwise be</p>
<b>Q7 Modification</b>	The rural topic paper needs amending to recognise (inter alia) the need for public transport to support work outside 9-5, to support social and leisure activity and to realistically identify barriers to sustainability in rural areas, including issues around healthcare facilities and the additional costs of living in a rural area with inadequate infrastructure to support increased development.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1179
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>The policy on Affordable Housing is broadly sound, in terms of the obligation on developers to make affordable housing available, but it fails to reference policy HOU2 (in particular para 8.19) concerning the makeup of such housing, and as such leaves the nature of affordable housing more open than it should be.</p> <p>In addition, it fails to recognise the issue of affordable housing in relation to infrastructure, especially in areas away from the urban core - the policy set in the local plan does not recognise that although the housing itself may be classified as affordable, and even available for social rent, that the takeup of such housing is frequently affected by the costs of living in more remote areas, where the lack of reliable public transport and other essential infrastructure make living in these areas unaffordable.</p> <p>In the absence of this infrastructure, on-site provision of affordable housing will have low take up.</p>
<b>Q7 Modification</b>	The plan needs to identify how infrastructure will support the delivery of affordable housing specifically in rural areas.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1170
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>PSD3 at page 16 suggests an allocation for Loggerheads Ward of "the order of 450 homes". It is not clear from the document the basis on which this number was calculated, and it does not reflect the Housing Needs Assessment carried out as part of the development of the Neighbourhood Plan which identified the housing need for the parish/ward. The level of development in Loggerheads has already exceeded the number set out in the Neighbourhood Plan, and even taking into account the difference in the periods covered by the two plans the volume of development proposed for Loggerheads is inconsistent with the robust Housing Needs Assessment carried out in the Neighbourhood Plan.</p> <p>No justification is given for this proposed number and it is not clear how this reflects the housing needs of the Parish or how it reflects the Parish's share of the overall housing needs identified for the Borough - it appears to be an arbitrary allocation.</p> <p>In addition to this, it is apparent that (in order to meet the annual targets set in the plan) that housing must be "built" and not just "planned".</p> <p>On two recent developments in Loggerheads building was "paused" because sales were poor - in particular there are difficulties in managing the take-up of affordable housing. It is questionable whether the market will exist for the volume of housing proposed in the Loggerheads ward/parish, given the lack of supporting infrastructure, and there is concern that the number of homes "planned" will not equate to the number actually "built" because of problems with sales, which will impact on the delivery of the targets set out in the plan.</p>
<b>Q7 Modification</b>	Given the existing level of development, there should not be further development of the scale proposed in Loggerheads - any development should be of housing suitable to meet the needs of the local population and should only be considered as sustainable development if adequate infrastructure provision is included, that this is not completely dependent on S106 developer contributions, and that enforcement of s106 obligations and planning conditions are rigorously enforced
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to.
<b>Comment ID</b>	NULLP1172
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love

<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>According to this policy, "The role of the settlement boundary is to define the built limits of a settlement and thus differentiate between what is the built area of a settlement where the principle of development is usually acceptable and the countryside where development is usually subject to additional restriction." It appears that the council are choosing to ignore this clear statement of policy by including the site LW53 in the local plan. This site is outside the settlement boundary agreed in the the Loggerheads Neighbourhood Plan, and it is clear both from the Policy Map on page 10 and personal observation that the site is not part of the "built area of the settlement" and is actually in "the countryside" The policy itself is sound, but the interpretation of it by the Council is flawed.</p>
<b>Q7 Modification</b>	To retain the settlement boundary agreed in the Loggerheads Neighbourhood Plan and remove remove LW53 from the site allocations on the basis that it is inconsistent with the policy.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1187
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>ED 005- Rural Area Topic paper</p> <p>This document is used to support policy PSD2 and PSD3 and is fundamentally flawed in a number of respects.</p> <p>Firstly, in relation to Public Transport, which requires that a "commutable bus service" is available solely to enable residents to access Newcastle Town Centre during what is described as "standard working hours" of 9 am to 5 pm. This fails to recognise the changing nature of work, in that far fewer jobs have "standard hours" of 9-5, for example, retail work or shift work and this is therefore an inappropriate criterion for a bus service to be "commutable".</p> <p>This criterion also ignores Saturday and Sunday working patterns which are, in the 21st century, much more prevalent, and frequently bus services are not available on those days, or significantly less frequent. It also makes the assumption that people in rural communities will only travel to Newcastle for work - it fails to recognise that people living in certain rural communities will almost certainly be working outside the Borough, or will need to travel onwards from the town centre to their place of work (for example in Stoke) and using the definition in the topic paper gives a false impression of sustainability in terms of public transport. It's a lazy definition, with no rational basis for its adoption.</p> <p>Secondly, by limiting the public transport criterion solely to work, the paper completely ignores the need for children and young people to attend colleges at appropriate times, fails to recognise needs for travel for social or leisure activities and even shopping, and completely ignores the need for travel to hospitals or other healthcare settings beyond GP practices.</p> <p>By failing to recognise these needs, the policy fails to support sustainable rural community access to essential facilities that enable them to live in rural communities.</p> <p>In addition to that, the paper fails to differentiate between healthcare facilities - making the erroneous assumption that a pharmacy and a GP surgery are in some way equivalent. Residents who need access to primary care services are unlikely to be able to receive them from a pharmacy and patients who need a pharmacy are unlikely to be able to access those facilities in a GP surgery.</p> <p>The paper fails to recognise that patients need to be able to physically access healthcare facilities and that (for example) the GP surgery in Ashley is not walkable safely from Loggerheads, and the public transport available seriously limits the times at which patients could attend.</p> <p>The topic paper fails to recognise the additional costs of living in rural communities which lack suitable essential infrastructure and these additional costs directly impact on (among other things) the takeup of affordable housing - in particular social rented housing.</p> <p>The fact that this flawed paper is referenced in support of policies PSD2 and PSD3 renders those policies less sound than they would otherwise be</p>
<b>Q7 Modification</b>	The rural topic paper needs amending to recognise (inter alia) the need for public transport to support work outside 9-5, to support social and leisure activity and to realistically identify barriers to sustainability

	in rural areas, including issues around healthcare facilities and the additional costs of living in a rural area with inadequate infrastructure to support increased development.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1169
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>ED003, the Infrastructure Delivery Plan contains quite significant errors and omissions and is unsuitable to be used as a supporting/reference document for the Local Plan.</p> <p>Specifically, it includes a number of errors related to Health services both in the Loggerheads Parish area and in the region. The map on Page 82 appears to identify a GP surgery near Blackbrook where no such surgery exists, misidentifies Ashley Surgery as a "Health Centre" and misidentifies or misnames a number of hospital facilities in the nearby area (Page85)</p> <p>In paragraph 3.163 the plan indicates that patients will register at two local GP practices, making no reference to GP surgeries commissioned by Shropshire, Telford and Wrekin ICB in Market Drayton, and in relation to LW74, in Appendix 1, does not include reference to the GP Practice at Baldwins Gate as being suitable for new residents of that development.</p> <p>On page 94, the map of open space and playing fields misidentifies a playing pitch which is part of a primary school.</p> <p>Appendix 1 to the document includes no reference to the highways improvements required to mitigate the development proposed for LW53.</p>
<b>Q7 Modification</b>	The IDP needs to be rewritten to accurately reflect the current situation and to include all the proposed mitigations required to deliver the developments proposed.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1173
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The policy IN1 states that "The Local Plan is supported by an Infrastructure Delivery Plan (IDP) prepared through joint working with public and private infrastructure providers. The IDP sets out the key infrastructure needed during the period of the Local Plan, how much this will cost and the expected sources of funding." The IDP contains many inaccuracies and errors and fails to include several infrastructure developments referred to in individual site allocations and reliance on the IDP as a supporting document for this policy is fundamentally flawed.</p> <p>It makes reference to a potential "Infrastructure Levy" that appears not to be a policy of the government elected in July 2024, and is already out of date on that basis.</p> <p>In addition, the IDP indicates a reliance on developer contributions to provide essential infrastructure to support contentious development through S106 and S278 obligations - both of which can potentially be challenged by developers on the grounds of financial viability, and which (by their nature) fail to look at infrastructure delivery on an holistic basis - obligations are linked to the delivery of individual developments</p>

	<p>rather than to the more complex aggregated impact of multiple developments in localities - referring in particular to development in the Rural areas where individual developments have (for example) created a number of Local Equipped Areas for Play linked to each individual development, but have failed to look at the wider community needs for infrastructure support generated by multiple developments over a comparatively short period of time in a small area.</p> <p>The policy also does not specify whether S106 contributions linked to developments will be subject to local consultation (for example reflecting policies in Neighbourhood Plans) and so may well not be properly aligned to local need. The example of multiple LEAPs being implemented as a key element of S106 obligations is a case in point.</p>
<b>Q7 Modification</b>	The Council should consider the introduction of a Community Infrastructure Levy and should (at the very least) engage with Parish Councils and other local bodies to consult on S106 obligations so that they recognise local need.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1178
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	<p>While recognising that this policy is, on the face of it, sound, in particular where it relates to the mix of housing for Market and Affordable development, (Paragraphs 7.18, 7.19 and 7.22) it is important that the council ensure the policy is complied with for large scale development proposals and that developers are reminded of their obligations under this policy to demonstrate compliance with the guidance levels or provide justification for non-compliance as it relates to their proposals.</p> <p>It is recognised that the business model for developers is not necessarily consistent with the mix of housing stated in the policy - for example, the housing mix in recently approved developments in rural areas has tended towards a greater proportion of larger properties and very little consideration has been given to the needs of older people either for specialist housing or for housing suitable for downsizing.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1189
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>ED 005- Rural Area Topic paper</p> <p>This document is used to support policy PSD2 and PSD3 and is fundamentally flawed in a number of respects.</p> <p>Firstly, in relation to Public Transport, which requires that a "commutable bus service" is available solely to enable residents to access Newcastle Town Centre during what is described as "standard working hours" of 9 am to 5 pm. This fails to recognise the changing nature of work, in that far fewer jobs have "standard hours" of 9-5, for example, retail work or shift work and this is therefore an inappropriate criterion for a bus service to be "commutable".</p> <p>This criterion also ignores Saturday and Sunday working patterns which are, in the 21st century, much more prevalent, and frequently bus services are not available on those days, or significantly less frequent. It also makes the assumption that people in rural communities will only travel to Newcastle for work - it fails to recognise that people living in certain rural communities will almost certainly be working outside the Borough, or will need to travel onwards from the town centre to their place of work (for example in</p>

	<p>Stoke) and using the definition in the topic paper gives a false impression of sustainability in terms of public transport. It's a lazy definition, with no rational basis for its adoption.</p> <p>Secondly, by limiting the public transport criterion solely to work, the paper completely ignores the need for children and young people to attend colleges at appropriate times, fails to recognise needs for travel for social or leisure activities and even shopping, and completely ignores the need for travel to hospitals or other healthcare settings beyond GP practices.</p> <p>By failing to recognise these needs, the policy fails to support sustainable rural community access to essential facilities that enable them to live in rural communities.</p> <p>In addition to that, the paper fails to differentiate between healthcare facilities - making the erroneous assumption that a pharmacy and a GP surgery are in some way equivalent. Residents who need access to primary care services are unlikely to be able to receive them from a pharmacy and patients who need a pharmacy are unlikely to be able to access those facilities in a GP surgery.</p> <p>The paper fails to recognise that patients need to be able to physically access healthcare facilities and that (for example) the GP surgery in Ashley is not walkable safely from Loggerheads, and the public transport available seriously limits the times at which patients could attend.</p> <p>The topic paper fails to recognise the additional costs of living in rural communities which lack suitable essential infrastructure and these additional costs directly impact on (among other things) the takeup of affordable housing - in particular social rented housing.</p> <p>The fact that this flawed paper is referenced in support of policies PSD2 and PSD3 renders those policies less sound than they would otherwise be</p>
<b>Q7 Modification</b>	The rural topic paper needs amending to recognise (inter alia) the need for public transport to support work outside 9-5, to support social and leisure activity and to realistically identify barriers to sustainability in rural areas, including issues around healthcare facilities and the additional costs of living in a rural area with inadequate infrastructure to support increased development.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1167
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>On Page 10 of the policies Map, Site Reference LW53 sits outside the Development Boundaries which were set as the village envelope that was agreed as part of the Loggerheads Neighbourhood Plan. No justification for amendment of this envelope boundary has been given, there has been no prior engagement with the Parish Council or with local residents concerning this change to the agreed envelope and it has been amended purely to include LW53 as a potentially suitable site for development.</p> <p>As is obvious from looking at the relevant Map, LW53 is clearly inconsistent with the development boundary agreed in the neighbourhood plan, which accurately reflects the nature of the Village and was itself modified when the plan was made to permit</p>
<b>Q7 Modification</b>	To restore the Development boundary to the envelope agreed in the Loggerheads Neighbourhood Plan.
<b>Comment ID</b>	NULLP1171
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Sound</b>	No



<b>Q6 Details</b>	<p>According to policy PSD4, "The role of the settlement boundary is to define the built limits of a settlement and thus differentiate between what is the built area of a settlement where the principle of development is usually acceptable and the countryside where development is usually subject to additional restriction." It appears that the council are choosing to ignore this clear statement of policy by including the site LW53 in the local plan. This site is definitely outside the settlement boundary agreed in the the Loggerheads Neighbourhood Plan, and it is clear both from the Policy Map on page 10 and to any reasonable observer of the site in relation to the "built area of the settlement" that the site is clearly not part of the "built area of the settlement", there are no properties other than Whitehouse Farm on that side of Muckleston Wood Lane, and that the site is actually in "the countryside", so should not be considered to be within the settlement boundary.</p> <p>The policy itself is sound, but the interpretation of it by the Council is flawed.</p>
<b>Q7 Modification</b>	To retain the settlement boundary agreed in the Loggerheads Neighbourhood Plan and remove remove LW53 from the site allocations on the basis that it is inconsistent with the policy relating to settlement boundaries.
<b>Comment ID</b>	NULLP1176
<b>Order</b>	94
<b>Title</b>	Policy IN5 Provision of Community Facilities
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN5
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This policy appears only to cover the retention of areas and facilities already in place and what is required should those community facilities be removed through development.</p> <p>It fails to recognise the need for "new" community facilities to be created to support development where no existing facilities are in place or where there is no opportunity to develop existing facilities.</p> <p>This is a crucial issue where development is being proposed in rural areas where community facilities, where they exist, are limited because they were never intended to meet the level of demand from a much larger population.</p> <p>Para 10.28 of the policy references the importance of community facilities in ensuring sustainability but then goes on solely to refer to actions to be taken to respond to the loss of such facilities, not that developers should (through s106 or other obligations) be expected to contribute to the development of community facilities required as a result of the increase in population caused by their proposed development.</p>
<b>Q7 Modification</b>	The policy needs to be amended to make reference to an obligation on developers to ensure that appropriate community facilities are in place to support their development proposals and that they should consider setting land aside for the development of such facilities on site or work with local partners to ensure that facilities can be made available.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to
<b>Comment ID</b>	NULLP1180
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Loggerheads Parish Council
<b>Consultee Position</b>	Planning and Environment Committee
<b>Consultee Family Name</b>	Love
<b>Consultee Given Name</b>	Jeff
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>ED 005- Rural Area Topic paper</p> <p>This document is used to support policy PSD2 and PSD3 and is fundamentally flawed in a number of respects.</p> <p>Firstly, in relation to Public Transport, which requires that a "commutable bus service" is available solely to enable residents to access Newcastle Town Centre during what is described as "standard working hours" of 9 am to 5 pm. This fails to recognise the changing nature of work, in that far fewer jobs have</p>

	<p>"standard hours" of 9-5, for example, retail work or shift work and this is therefore an inappropriate criterion for a bus service to be "commutable".</p> <p>This criterion also ignores Saturday and Sunday working patterns which are, in the 21st century, much more prevalent, and frequently bus services are not available on those days, or significantly less frequent. It also makes the assumption that people in rural communities will only travel to Newcastle for work - it fails to recognise that people living in certain rural communities will almost certainly be working outside the Borough, or will need to travel onwards from the town centre to their place of work (for example in Stoke) and using the definition in the topic paper gives a false impression of sustainability in terms of public transport. It's a lazy definition, with no rational basis for its adoption.</p> <p>Secondly, by limiting the public transport criterion solely to work, the paper completely ignores the need for children and young people to attend colleges at appropriate times, fails to recognise needs for travel for social or leisure activities and even shopping, and completely ignores the need for travel to hospitals or other healthcare settings beyond GP practices.</p> <p>By failing to recognise these needs, the policy fails to support sustainable rural community access to essential facilities that enable them to live in rural communities.</p> <p>In addition to that, the paper fails to differentiate between healthcare facilities - making the erroneous assumption that a pharmacy and a GP surgery are in some way equivalent. Residents who need access to primary care services are unlikely to be able to receive them from a pharmacy and patients who need a pharmacy are unlikely to be able to access those facilities in a GP surgery.</p> <p>The paper fails to recognise that patients need to be able to physically access healthcare facilities and that (for example) the GP surgery in Ashley is not walkable safely from Loggerheads, and the public transport available seriously limits the times at which patients could attend.</p> <p>The topic paper fails to recognise the additional costs of living in rural communities which lack suitable essential infrastructure and these additional costs directly impact on (among other things) the takeup of affordable housing - in particular social rented housing.</p> <p>The fact that this flawed paper is referenced in support of policies PSD2 and PSD3 renders those policies less sound than they would otherwise be</p>
<b>Q7 Modification</b>	The rural topic paper needs amending to recognise (inter alia) the need for public transport to support work outside 9-5, to support social and leisure activity and to realistically identify barriers to sustainability in rural areas, including issues around healthcare facilities and the additional costs of living in a rural area with inadequate infrastructure to support increased development.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As the corporate body responsible for Loggerheads Neighbourhood Plan, and as a statutory consultee on Planning matters, the Parish Council would wish to ensure its views are considered and responded to

<b>Comment ID</b>	NULLP206
<b>Order</b>	195
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Madeley Parish Council
<b>Consultee Position</b>	Clerk
<b>Consultee Family Name</b>	Lovell
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.153
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>The paragraph states that full regard should be had to the relevant policies of the Neighbourhood Development Plan (NDP).</p> <p>The NDP states at policy HOU1: New residential development will be supported where it is in accordance with development plan policy and in particular in the following locations:</p> <ul style="list-style-type: none"> <li>· Within the Madeley village envelope and Madeley Heath village envelope;</li> </ul> <p>Support for approval will be subject to:</p> <ul style="list-style-type: none"> <li>· There being suitable vehicular access to the site and no severe adverse impact on traffic safety and capacity;</li> </ul> <p>This site is not within the village envelope and development of the site would result in severe adverse impact on traffic safety and capacity.</p> <p>The NDP states at policy TRA1: Critical Road Junctions</p> <p>Development must not cause any severe adverse impact on capacity or road safety. This is especially critical for existing transport pressure points, which are:</p> <ul style="list-style-type: none"> <li>· Junction of A525 and A531 in Madeley Heath (known locally as Monument Junction);</li> <li>· Junction of A525 and Manor Road;</li> </ul> <p>Both of these critical junctions would be impacted by the development.</p>
<b>Q7 Modification</b>	The Parish Council, having regard to the policies of the NDP, considers that this is not the correct site for development.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP203
<b>Order</b>	195
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Madeley Parish Council
<b>Consultee Position</b>	Clerk
<b>Consultee Family Name</b>	Lovell
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.150
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	The paragraph states that a limited part of the site is affected by surface water flooding. There are ongoing investigations currently being undertaken by Staffordshire County Council with regard to severe flooding issues affecting the site and surrounding areas.
<b>Q7 Modification</b>	The paragraph should state that the site is affected by severe surface water flooding issues.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP204
<b>Order</b>	195
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Madeley Parish Council

<b>Consultee Position</b>	Clerk
<b>Consultee Family Name</b>	Lovell
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	14.144
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	The paragraph states that any development at the site MAY require junction improvements. The Road junction at Bar Hill is highlighted in the Neighbourhood Development Plan for Madeley as a critical junction and the Parish Council considers this junction as requiring improvements for road safety purposes. Any development at Bar Hill would require significant upgrading to this junction to ensure road safety was not compromised. It is for that reason that policy TRA1 in the Madeley Neighbourhood Plan requires this as a material consideration when considering potential housing developments.
<b>Q7 Modification</b>	The paragraph should state that any development at the site MUST require road junction improvements.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP205
<b>Order</b>	193
<b>Title</b>	Madeley and Betley
<b>Consultee Company / Organisation</b>	Madeley Parish Council
<b>Consultee Position</b>	Clerk
<b>Consultee Family Name</b>	Lovell
<b>Consultee Given Name</b>	Natalie
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	The policies map indicates an extension to Madeley High School. The Council does not oppose the expansion of the school site subject to a sufficient traffic management plan being put in place. Council's concerns relate to the volume of traffic and air quality issues arising from increasing the school roll. Any extension of the school would exacerbate existing issues with traffic and parking around the site.
<b>Q7 Modification</b>	The Parish Council suggests an access road be constructed providing access to the rear of the site for dropping off/collecting pupils.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP143
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Lycett
<b>Consultee Given Name</b>	Lee
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I don't believe that this part of the plan is sound nor is it justified.</p> <p>This site is 4x larger than the Council say they need. The employment/housing ratio will become unbalanced which could well mean we will be faced with even more development.</p> <p>The site is convenient on the M6 and not too far away from major cities such as Manchester, Liverpool and Birmingham but with no transport links it will mean employees travelling in by car, van, HGV etc. This will have a huge impact on a village that does not have the infrastructure in place to cope with such an enormous increase in traffic.</p> <p>I live on (redacted by admin) where one of the proposed emergency exits will be - this is a single track, country lane without any footpaths. I have seen at first hand the volume of traffic on this road in particular when there are problems on the A500 &amp; M6, people use this as a short cut causing mayhem, gridlock and most importantly major safety concerns. In addition there will be an increase in carbon monoxide, noise, tyre wear and other vehicle pollutants. This road simply isn't suitable for a significant increase in cars, the high number of HGV's visiting the site and additional work vans needed to support businesses.</p>
<b>Q7 Modification</b>	To make the Local Plan sound I strongly recommend the removal of site AB2.
<b>Q9 Hearing reasons</b>	N/A

<b>Comment ID</b>	NULLP43
<b>Order</b>	201
<b>Title</b>	Silverdale
<b>Consultee Family Name</b>	Macdonald
<b>Consultee Given Name</b>	Samantha
<b>Q4 Part of document</b>	Policies Map
<b>Q6 Details</b>	<p>i feel i should comment having just moved to the area that borders Silverdale</p> <p>The loss of thousands of mature trees, including broadleaved and conifer species located in the former Keele Golf Course is not explored in the evidence base other than the loss of Bog's Wood and suggested mitigation. Within the former Keele Golf course there are also several blue corridors, which not assessment for ecological impact. If these blue and green habitats are not identified in accompanying reports in the Draft Local plan, will there be any onus for the masterplan to provide habitat protection? Silverdale assumes the answer will be no.</p> <p>The exceptional circumstances case is challengeable. Housing Affordability in Newcastle under Lyme is relatively low and is falling relative to even large unitary authorities in the region. Another case could be made for much more emphasis on brownfield land to reduce poor quality housing stock and to eliminate existing contaminated and other unused land rather than to build on greenfields.</p> <p>The proposals for sites SP11.SP12 and SP23 reduce the greenbelt by 82.95 ha by new build (Newcastle under Lyme: 78-78). A further 10.68 ha at SP14 is lost without an allocation (Newcastle under Lyme 2020). Overall, the proposals reduce greenbelt by 25 per cent in Silverdale alone in perpetuity. There is little to be gained by the existing residents to compensate. Loss of 25 per cent open land on a sloping topography has added environmental risks exacerbated by climate change where there has not been sufficient scientific investigation at the appropriate geography.</p> <p>Worse, the proposed land allocation at SP11, SP12 and SP23 would undermine the original character of Silverdale as a community 'nestled in a green valley', a defining characteristic of former mining villages across Britain.</p>



<b>Comment ID</b>	NULLP643
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Mackay
<b>Consultee Given Name</b>	Doreen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The NPPF rules will be changing over the next few weeks, which I understand will have stricter controls on the use of Greenbelt land so this current plan appears to be not legally compliant.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP642
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Mackay
<b>Consultee Given Name</b>	Doreen
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The consultation process has been inadequate and appears to have been a tickbox exercise rather than a serious public consultation process. I and many of my neighbours were unaware that this local plan was in the pipeline. I believe the only notification provided by the council was a small notice attached to the field gate of NC13 that got wet and blew away in less than a week. More adequate notification should have been initiated e.g. by way of a leaflet drop to ensure residents were fully aware of these proposals. The planning portal itself difficult to navigate and provide comment. I suspect a number of people who are not IT savvy gave up trying.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP644
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Mackay
<b>Consultee Given Name</b>	Doreen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	NC13
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I can see no evidence of any investigation into concerns over school parking and increased traffic through already congested residential areas. The exit from Freedom Drive is already difficult to navigate as it is located on a bend.
<b>Q7 Modification</b>	What investigation has been done by the council into the use of derelict Brownfield sites in the area? What, if any traffic surveys have been completed? The road through the village just past the school is narrow and with the parking of cars means that two cars cannot pass making this dangerous for pedestrians and cars as there is no pavement there either. Has any investigation been completed around infrastructure? Trying to get a doctors appointment is nigh on impossible at the best of times. This is a semi-rural area with little employment oppurtunities which will result in increased vehicle use. The idea is to reduce the Borough's carbon footprint however the plan will have the opposite effect I therefore feel the choice of NC13 as a proposed development site is wrong.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP443
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Maddock
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I would like to put forward a number of points as to why I believe the Local Plan is unsound, with the focus upon plans for the village of Audley, the proposed strategic employment site of AB2 and the proposed housing sites of AB12, AB15 and AB33, which are all on Green Belt land but do not meet the requirements of exceptional circumstances for the removal from the Green Belt.</p> <p><b>AB2</b></p> <p>This development removes a whopping 80 ha from the Green Belt for 22 ha of employment which Newcastle under Lyme Council claims is a shortfall across the Borough. How can this be justified? I live close to the location of the proposed site and access J16 of the M6 on a regular basis and it is abundantly clear that the junction is awful at rush hour in the mornings with traffic queuing back a mile from the junction and this site would only add to this massive disruption for motorists. Add to that, the people travelling to the employment site by car (there is very limited public transport for Audley and no buses have gone in the Crewe direction since the 1970s) Employees are unlikely to cycle to and from Audley after a long shift in the warehouse. Add to this, the employment site will generate a large amount of traffic in the form of heavy goods vehicles, service vehicles and employee's vehicles which will only exasperate the current junction queuing situation. An alternative drivers may take is to use Audley as a rat run. Currently, any issues arising on the M6 or the A500 result in Audley being used to bypass congested areas and this happens on a regular basis. Add to this the traffic to and from the employment site and the village of Audley runs the risk of being regularly gridlocked. Audley is a rural village and has horse riders and ramblers frequenting the roads (some with no pavements). I worry that it is only a matter of time that there is a fatal accident if this proposed site goes through. Therefore, on this basis, I feel the proposed employment site is unsound. In the case of AB2, there are multiple warehouse sites just outside the Borough, many standing empty. Why build another one, especially at the scale proposed? Warehouses do not bring mass employment, especially skilled employment to an area and even if this one did, there is no guarantee that the employment would benefit the residents of the village. AB2 will be an eyesore to every resident that walks the footpaths that surround the village. To remove this area from the Green Belt, does this represent exceptional circumstances? I feel it doesn't and that there are far more suitable sites within the Borough.</p> <p><b>AB12, AB15, AB33 and AB2 and the impact upon the village.</b></p> <p>The impact upon the village's infrastructure will be catastrophic. Building in these locations will, without doubt, bring in a serious amount of traffic to the village which will mean extensive development of new roads to be created to cope with inevitable traffic that will need to access the proposed developments. Audley village, with two small car parks, is already suffering the impact of increased car ownership by residents already living here, with many people forced to park on double yellow lines and in turn hampering safety. Audley has recently lost some of its bus service, which means more cars and taxis will be on the roads. Then there is the impact on the facilities like, the doctors' and dentists' surgeries etc. The primary and secondary schools are at full capacity. With the advent of the proposed 213 new houses to be built in the Audley Parish, where will the children of these new households go to school? The local schools are at full capacity. I am an ex school governor so I am aware of the situation locally. Will the newly refurbished sewage works be able to cope with the additional houses on the plan? I am reliably informed it will not.</p>
<b>Q7 Modification</b>	<b>AB2</b> cannot be justified as removing 80ha from the Green Belt for 22ha of employment land seems excessive. The location will not be effective because the M5/A500 junction is inadequate and will not be able to support such a large site. It is on this basis that I propose the site, AB2, is unsound. It is for this reason I feel it should be removed from the Local Plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP445
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Maddock
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15

<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I would like to put forward a number of points as to why I believe the Local Plan is unsound, with the focus upon plans for the village of Audley, the proposed strategic employment site of AB2 and the proposed housing sites of AB12, AB15 and AB33, which are all on Green Belt land but do not meet the requirements of exceptional circumstances for the removal from the Green Belt.</p> <p><b>AB15</b> My property in (redacted by admin), backs onto this site and I have lived here for 35 years so I know the land well. The wildlife on the land includes a parliament of rooks, foxes and buzzards hunt in the field. According to ED008 Green Belt Review Report part 4 presented by ARUP -</p> <p>The site is considered to be available as it was promoted by the owner and is not in active use.</p> <p>Yet cattle are grazing there and have been all year (time stamped images available). Also according to this document, AB15 is in Flood Zone 1 and does flood in the lower areas in rainy months. Building here does cause concern for nearby residents as the water table is high at this lower point of the village. Developing on land and fields reduces the area that rainfall can be absorbed and increases the risk of flooding. The roads around Audley already flood when there is a heavy downpour. Reducing the green belt will increase the amount of flooding. Destroying green belt actually increases our carbon footprint. Green belt actually captures carbon, provides space for water to prevent flooding, and protects the water supply. Removing fields and oxygen giving trees will also have an impact on air quality. To remove this area from the Green Belt, does this represent exceptional circumstances? I feel it doesn't and that there are far more suitable sites within the Borough.</p> <p><b>AB12, AB15, AB33 and AB2 and the impact upon the village.</b> The impact upon the village's infrastructure will be catastrophic. Building in these locations will, without doubt, bring in a serious amount of traffic to the village which will mean extensive development of new roads to be created to cope with inevitable traffic that will need to access the proposed developments. Audley village, with two small car parks, is already suffering the impact of increased car ownership by residents already living here, with many people forced to park on double yellow lines and in turn hampering safety. Audley has recently lost some of its bus service, which means more cars and taxis will be on the roads. Then there is the impact on the facilities like, the doctors' and dentists' surgeries etc. The primary and secondary schools are at full capacity. With the advent of the proposed 213 new houses to be built in the Audley Parish, where will the children of these new households go to school? The local schools are at full capacity. I am an ex school governor so I am aware of the situation locally. Will the newly refurbished sewage works be able to cope with the additional houses on the plan? I am reliably informed it will not.</p>
<b>Q7 Modification</b>	<p><b>AB12, AB15 and AB33</b> if built upon, creating 213 extra houses will have a catastrophic impact on the infrastructure of the village of Audley. The removal of this land from the Green Belt must be justified and only done in exceptional circumstances. It is obvious that this land would be attractive to developers as is all agricultural land that is removed from the Green Belt and designated for building, but this should not be a driver for this decision. In Section 6 above, I have highlighted my concerns in relation to village infrastructure, flooding and excessive traffic. It is on these grounds I feel these proposed sites <b>AB12, AB15 and AB33</b> are unsound and should be removed from the Local Plan</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP446
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Maddock
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I would like to put forward a number of points as to why I believe the Local Plan is unsound, with the focus upon plans for the village of Audley, the proposed strategic employment site of AB2 and the proposed housing sites of AB12, AB15 and AB33, which are all on Green Belt land but do not meet the requirements of exceptional circumstances for the removal from the Green Belt.</p> <p><b>AB33</b> Is adjacent to AB15 and suffers the same flooding in lower areas. Once again, in the Green Belt Review Report, it is reported that the land is not in active use, yet cattle are grazing there and have been all year (time stamped images available). This land is owned by Staffordshire County Council and was a starter farm for up and coming farmers. The local people of Audley view the sale of this farm land as asset stripping by the County Council to bring in revenue at the cost of encouraging young people into farming. The proposed access from Park Lane or Nantwich Road would have some serious traffic problems. Park Lane is a narrow country lane used by dog walkers and horse riders. To allow access for 55 houses would need extensive road works and safety would have to be factored in. If AB2 were to go ahead, then Nantwich Road (B5500) would be an alternative route to avoid congestion as alluded to above. Access from this road would have serious implications. To remove this area from the Green Belt, does this represent exceptional circumstances? I feel it doesn't and that there are far more suitable sites within the Borough.</p>

	<p><b>AB12, AB15, AB33 and AB2 and the impact upon the village.</b></p> <p>The impact upon the village's infrastructure will be catastrophic. Building in these locations will, without doubt, bring in a serious amount of traffic to the village which will mean extensive development of new roads to be created to cope with inevitable traffic that will need to access the proposed developments. Audley village, with two small car parks, is already suffering the impact of increased car ownership by residents already living here, with many people forced to park on double yellow lines and in turn hampering safety. Audley has recently lost some of its bus service, which means more cars and taxis will be on the roads. Then there is the impact on the facilities like, the doctors' and dentists' surgeries etc. The primary and secondary schools are at full capacity. With the advent of the proposed 213 new houses to be built in the Audley Parish, where will the children of these new households go to school? The local schools are at full capacity. I am an ex school governor so I am aware of the situation locally. Will the newly refurbished sewage works be able to cope with the additional houses on the plan? I am reliably informed it will not.</p>
<b>Q7 Modification</b>	<p><b>AB12, AB15 and AB33</b> if built upon, creating 213 extra houses will have a catastrophic impact on the infrastructure of the village of Audley. The removal of this land from the Green Belt must be justified and only done in exceptional circumstances. It is obvious that this land would be attractive to developers as is all agricultural land that is removed from the Green Belt and designated for building, but this should not be a driver for this decision. In Section 6 above, I have highlighted my concerns in relation to village infrastructure, flooding and excessive traffic. It is on these grounds I feel these proposed sites <b>AB12, AB15 and AB33</b> are unsound and should be removed from the Local Plan</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP444
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Maddock
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I would like to put forward a number of points as to why I believe the Local Plan is unsound, with the focus upon plans for the village of Audley, the proposed strategic employment site of AB2 and the proposed housing sites of AB12, AB15 and AB33, which are all on Green Belt land but do not meet the requirements of exceptional circumstances for the removal from the Green Belt.</p> <p><b>AB12</b></p> <p>The biggest of the housing plots has no representation in the ED008 Green Belt Review Report part 4 presented by ARUP. Here, the biggest concern is access to such a large plot from very narrow access roads. The surrounding area is approached by terraced house streets with no off road parking so drivers park on the pavements. I can be dangerous now but with increased traffic, it could be lethal. To remove this area from the Green Belt, does this represent exceptional circumstances? I feel it doesn't and that there are far more suitable sites within the Borough.</p> <p><b>AB12, AB15, AB33 and AB2 and the impact upon the village.</b></p> <p>The impact upon the village's infrastructure will be catastrophic. Building in these locations will, without doubt, bring in a serious amount of traffic to the village which will mean extensive development of new roads to be created to cope with inevitable traffic that will need to access the proposed developments. Audley village, with two small car parks, is already suffering the impact of increased car ownership by residents already living here, with many people forced to park on double yellow lines and in turn hampering safety. Audley has recently lost some of its bus service, which means more cars and taxis will be on the roads. Then there is the impact on the facilities like, the doctors' and dentists' surgeries etc. The primary and secondary schools are at full capacity. With the advent of the proposed 213 new houses to be built in the Audley Parish, where will the children of these new households go to school? The local schools are at full capacity. I am an ex school governor so I am aware of the situation locally. Will the newly refurbished sewage works be able to cope with the additional houses on the plan? I am reliably informed it will not.</p>
<b>Q7 Modification</b>	<p><b>AB12, AB15 and AB33</b> if built upon, creating 213 extra houses will have a catastrophic impact on the infrastructure of the village of Audley. The removal of this land from the Green Belt must be justified and only done in exceptional circumstances. It is obvious that this land would be attractive to developers as is all agricultural land that is removed from the Green Belt and designated for building, but this should not be a driver for this decision. In Section 6 above, I have highlighted my concerns in relation to village infrastructure, flooding and excessive traffic. It is on these grounds I feel these proposed sites <b>AB12, AB15 and AB33</b> are unsound and should be removed from the Local Plan</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP659
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Madew
<b>Consultee Given Name</b>	Deborah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Land off Nantwich Road/Park Lane.</p> <p>As a resident of Audley Rural Parish, I am also a member of Protect Audley Parish Greenbelt group and add my support to all of their investigations and recommendations regarding all of the proposed sites in the Local Plan (AB2, AB33, AB15 and AB12)</p> <p>Also I am concerned about the site access points being narrow roads which are accidents waiting to happen.</p> <p>AB33 has a high water table and for most of the year is flooded. This site is currently farm land owned by Staffs County Council which is used as a starter farm for people to get into farming and is a valuable resource for increasing numbers in our aging farming community.</p> <p>Higher traffic numbers would detrimentally affect residents well being and safety.</p> <p>Our village is already being used as a rat run especially when there are accidents and incidents on the M6 and A500..which are frequent.</p>
<b>Q7 Modification</b>	The modification needs to be to remove thses sites from the Local Plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP658
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Madew
<b>Consultee Given Name</b>	Deborah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>This site is totally unsuitable for the massive warehouse development as the existing daily road bottlenecks on A500 and M6 junction 16 will be acerbated by additional traffic.</p> <p>The site would have emergency access points along single track lanes which are used by walkers and horse riders.</p> <p>Workers at the site would obviously try to avoid the bottlenecks on the A500/M6 Jct 16 junction thus massively increasing the chance of fatalities on these narrow lanes.</p> <p>There would be a huge increase in HGV traffic. congestion, increased air pollution from CO2 and tyre particulate as well as additional noise pollution and light pollution.</p> <p>This site is 40% bigger than Newcastle Borough actually need.</p> <p>The site is on the Cheshire/Staffordshire border, closer to Crewe than Newcastle where there are many existing employment sites already in existence, and probably more in the pipeline as Crewe is a railway town with links to the HS2 development. Who knows what will happen next !</p> <p>The site is also close to existing development along the A500 corridor near to Tunstall.</p> <p>I feel there is no reason for this development to take so much of our agricultural land and green belt where there are other brownfield sites available within our vicinity.</p> <p>This development would remove valuable agricultural land which acts as a carbon sink.</p>
<b>Q7 Modification</b>	The modification needs to be to remove this site from the Local Plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP926
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Malkin
<b>Consultee Given Name</b>	Victoria and Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Audley
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We would like to question the soundness and legality of the final draft local plan for Newcastle-under-Lyme with regards to the methodology used in assessing and decision making in the allocation of sites in Audley, specifically AB32/AB33 for much needed housing.</p> <p>We believe it is biased to remove AB32 from the local plan. Both AB33 and AB32 are greenfield sites. In the first draft local plan, both sites were assessed as a strong contribution to greenbelt purposes. In the final plan, AB33 has been reassessed as a moderate contribution to greenbelt purposes, but AB32 still a strong contribution. This was explained by the council in a meeting with ourselves on 2nd Sept, in that this is because the site size of AB33 had been reduced. We believe the methodology used in this reassessment is not sound. If AB33 is to be released for housing, AB32 will be surrounded on three sides by housing. How can that be assessed as greenbelt land when it will be surrounded by houses and essentially infill. We do not believe this can legally be allowed to surround greenbelt land in this way. Secondly, the grading of the land, both AB33 and AB32 are grade 3 agricultural land and both covered by a mineral safeguarded area.</p> <p>Thirdly, with regards to sewers running through the site, the sewers run through both AB33 and AB32. AB32 has been in our family for over 80 years now and has never flooded in that time. We are though aware of flooding/sewer issues on Alsager Road, but this is closer to the AB33 site.</p> <p>The point with regards to Audley being within 150m of AB32 is the same as AB33 and there are 3 listed buildings within 250m of AB33, whereas there are only 2 listed buildings within 250m of AB32.</p> <p>With regard to the availability of access to AB32, we do have legal access to the plot via Nursery Gardens. The first draft local plan stipulated " the site should be masterplan led with AB33 with access taken from the adjoining site" which would negate the need for access via Nursery Gardens, where is the evidence base for this being removed from the final local plan?</p> <p>We believe that if this final plan is adopted, our land will be locked in the middle of a housing estate on 3 sides and is most definitely NOT valuable greenbelt land for Audley. We are seeking legal advice as to our options if this plan is adopted as it is drafted.</p> <p>We were very much encouraged and supported to put our land forward in the plan by the local council in the call for sites as we are aware of the much needed local and affordable housing.</p> <p>We have had to endure over 2 years of the spreading of mis-information by some members of the local community and on social media, particularly the PAPG Protect Audley Parish Greenbelt facebook platform during the consultation processes and even a member of Audley Parish Council, and what is essentially bullying, character assassinations and the spreading of lies, and all this has achieved is to depreciate the value of our land, and that it will still be classed as greenbelt is now ludicrous!</p> <p>We would appreciate that our concerns are investigated/considered prior to the final local plan being adopted.</p>
<b>Q7 Modification</b>	<p>To include AB32 in the final draft local plan to release for affordable housing with access from AB33 site. If not included in the plan, the land needs to be reassessed as to its value as greenbelt land, as will be surrounded on 3 of the 4 boundaries by housing.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP924
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Malkin
<b>Consultee Given Name</b>	Victoria and Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We would like to question the soundness and legality of the final draft local plan for Newcastle-under-Lyme with regards to the methodology used in assessing and decision making in the allocation of sites in Audley, specifically AB32/AB33 for much needed housing.</p> <p>We believe it is biased to remove AB32 from the local plan. Both AB33 and AB32 are greenfield sites. In the first draft local plan, both sites were assessed as a strong contribution to greenbelt purposes. In</p>



the final plan, AB33 has been reassessed as a moderate contribution to greenbelt purposes, but AB32 still a strong contribution. This was explained by the council in a meeting with ourselves on 2nd Sept, in that this is because the site size of AB33 had been reduced. We believe the methodology used in this reassessment is not sound. If AB33 is to be released for housing, AB32 will be surrounded on three sides by housing. How can that be assessed as greenbelt land when it will be surrounded by houses and essentially infill. We do not believe this can legally be allowed to surround greenbelt land in this way.

Secondly, the grading of the land, both AB33 and AB32 are grade 3 agricultural land and both covered by a mineral safeguarded area.

Thirdly, with regards to sewers running through the site, the sewers run through both AB33 and AB32. AB32 has been in our family for over 80 years now and has never flooded in that time. We are though aware of flooding/sewer issues on Alsager Road, but this is closer to the AB33 site.

The point with regards to Audley being within 150m of AB32 is the same as AB33 and there are 3 listed buildings within 250m of AB33, whereas there are only 2 listed buildings within 250m of AB32.

With regard to the availability of access to AB32, we do have legal access to the plot via Nursery Gardens. The first draft local plan stipulated " the site should be masterplan led with AB33 with access taken from the adjoining site" which would negate the need for access via Nursery Gardens, where is the evidence base for this being removed from the final local plan?

We believe that if this final plan is adopted, our land will be locked in the middle of a housing estate on 3 sides and is most definitely NOT valuable greenbelt land for Audley. We are seeking legal advice as to our options if this plan is adopted as it is drafted.

We were very much encouraged and supported to put our land forward in the plan by the local council in the call for sites as we are aware of the much needed local and affordable housing.

We have had to endure over 2 years of the spreading of mis-information by some members of the local community and on social media, particularly the PAPG Protect Audley Parish Greenbelt facebook platform during the consultation processes and even a member of Audley Parish Council, and what is essentially bullying, character assassinations and the spreading of lies, and all this has achieved is to depreciate the value of our land, and that it will still be classed as greenbelt is now ludicrous!

We would appreciate that our concerns are investigated/considered prior to the final local plan being adopted.

<b>Comment ID</b>	NULLP935
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>Please see attached representations. Policy PSD 2 confirms that Rural Centres will meet some of the development need within the Borough and that this will include 'Audley and Bignall End'.</p> <p>This broad approach is supported as our client's proposal would help contribute towards providing housing in these locations.</p> <p>However given the additional housing commitments that the draft National Planning Policy Framework indicates that the Borough will now face, it is recommended that Audley be recognised as a Rural Centre that can deliver greater growth than currently proposed. Importantly, paragraph 144 of the draft National Planning Policy Framework states that:</p> <p>"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." [Knights' emphasis]</p> <p>The site is considered to fall within the definition of 'Grey Belt' (as set out in Annex A) which states that: "Grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt)." [Knights' emphasis]</p> <p>Aside from its Green Belt designation, the site is not located within any of the excluding areas listed in footnote 7. Furthermore, the previous appeal for the 7no. dwellings adjacent to the site (LPA ref. 18/00122/FUL) confirmed that the site was indeed a sustainable location for new residential development. 3.10 Paragraph 155 goes on to state that: "Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:</p> <ul style="list-style-type: none"> <li>a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;</li> <li>b. Necessary improvements to local or national infrastructure; and</li> <li>c. The provision of new, or improvements to existing, green spaces that are accessible to the public.</li> </ul> <p>Where residential development is involved, the objective should be for new residents to be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces."</p> <p>The current planning application includes a viability report that demonstrates that it would be unviable to deliver affordable housing on this site (given that the minimum amount of development has been proposed to enable the redevelopment of Madeley Manor Farm). Nevertheless, our client owns further land around this site which could be considered to also comprise Grey Land and may well be able to provide affordable housing provision as part of a Phase 2 scheme.</p> <p>Having consideration to the above, the redevelopment of this site has the potential to deliver much needed housing to the village to support its sustainable growth in a way that could enable the next generation of the village to affordably continue to live within the village that they grew up in. The client owns substantial land around the proposed development site (including land immediately to the east of the cricket ground) which would enable improved sports facilities as well as opportunities for more accessible open space to serve the village.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>
<b>Comment ID</b>	NULLP937
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside

<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy seeks to define Development Boundaries, Rural Centres and Other Settlement Boundaries within the draft Policy Map.</p> <p>Criterion 2 goes on to state that: "Within Development or Other Settlement Village Boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan."</p> <p>Whilst the New Farm, Audley site is located outside of the open countryside (and instead within the Green Belt) our client is broadly in support of this policy.</p> <p>Criterion 4c goes on to state that new development will be supported in the open countryside: "Development associated with the conversion and enhancement or redevelopment of a heritage asset".</p> <p>Our client is broadly in support of this proposal in that this policy as it acknowledges that proposals can be acceptable where they can ensure the ongoing viability of an existing heritage asset. However it is requested that the text in this policy explicitly refer to 'enabling developments' and provide confirmation that such enabling developments can be supported in accordance with paragraph 208 of the Framework (which states that "local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from these policies") and that the LPA will consider offsite enabling developments (including where appropriate outside of the immediate locality of the site) where proposals have been fully justified.</p> <p>It is therefore recommended that the Policy Map be amended along the lines illustrated in Figure 2 (See attachment). This would include all the proposed landscaped areas as well as the 7no. dwellings approved under 18/00122/FUL (located to the west) and the New Farm dwelling itself (located to the south).</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>
<b>Comment ID</b>	NULLP941
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (omision site)
<b>Q6 Details</b>	<p>Please see attached representations. Knights have been instructed by Manor View Care Home Limited to promote Land at New Farm, Cross Lane, Audley as a housing allocation in the emerging Local Plan 2020-2040. Knights previously promoted this site through the Regulation 18 Local Plan consultation in August 2022 and a Call for Sites Nomination Form in August 2022 and this submission serves as an update to the previous representations.</p> <p>The site measures 2.6 hectares, it is located a short distance to the north of the settlement boundary of Audley and is washed over by the Green Belt. The site is shown in context on the adopted Policy Map in Figure 1.</p> <p>Knights have previously promoted this site (along with wider land within our client's ownership which totals 22.4 hectares) on behalf of our client requesting this site to be considered for housing through the submission of a Call for Sites submission in January 2022.</p> <p>Planning permission was granted at appeal to replace a builder's yard with 7no. dwellings on 7 June 2019 (LPA ref. 18/00122/FUL and PINS reference APP/P3420/W/18/3219254). This development has been commenced. This site is located immediately to the west of the New Farm site. In allowing that appeal, the Planning Inspector considered that the site was a sustainable location for housing which would enhance the vitality of Audley. Planning permission has also been applied on the New Farm site to erect 39no. market homes and associated recreational areas as an off-site enabling development to facilitate the conversion and retention of Madeley Manor which is also owned by our client. This application was submitted in June 2023 under LPA ref. 23/00522/FUL and is pending determination (with an anticipated planning committee date of 8 October 2024 (with an anticipated officer recommendation for approval and an acknowledgement that the scheme would be technically sound). The application follows substantial pre-application discussions with the LPA and has been subject to an Urban Vision design review panel, SPCG engagement and a public engagement exercise.</p>

	<p>Madeley Manor itself is a grade II listed building and is also located in the Green Belt, it has been vacant since July 2015 and has been marketed for over two years. Planning permission was previously submitted in January 2021 (LPA refs. 21/00021/FUL and 21/00022/LBC) to convert the manor house and provide on-site enabling development in the form of two apartment blocks that would provide a total 52no. apartments however objections were raised by the Council's conservation officer and Historic England and that scheme was subsequently withdrawn.</p> <p>A subsequent planning application and application for listed building consent was submitted and approved to convert the manor house to provide 14no. dwellings (with no on-site enabling development proposed) and this was subsequently approved (LPA refs. 21/01175/FUL and 21/01176/LBC) in March 2023. However it isn't financially viable to undertake the approved conversion works, as there would be a circa. £2.7m shortfall (which is referred to as a conservation deficit). As such, it is probable that these works would not be undertaken without some degree of funding from another source. The development proposals at New Farm include a viability appraisal which confirm that would generate a net profit of 16.19% (which is at the lower range of profit margins expected by developers) and therefore it has been demonstrated that the provision of 39 dwellings is the minimum amount of development required to enable the implementation of the Madeley Manor consents.</p> <p>The Regulation 19 Local Plan seeks to allocate several sites around the edge of Audley and Bignall End as residential allocations (and remove them from the Green Belt) which would provide a total of 270no. dwellings. Our client's site is not proposed to be taken out of the Green Belt as part of the draft Local Plan and it is therefore recommended that this site be allocated as a residential development.</p> <p><b>SUMMARY</b></p> <p>It has been demonstrated that there is a clear and robust argument in favour of removing New Farm, Cross Lane, Audley from the Green Belt and allocating it for residential purposes. The site would bring forward substantial benefits to Audley and the Borough as a whole (as demonstrated by the Economic Benefits Statement that was produced by Pegasus Group in support of planning application 23/00522/FUL) and would also facilitate the redevelopment of Madeley Manor to enable it to be conserved and put to a viable use consistent with its conservation for the foreseeable future. The proposal would provide much needed family housing which is currently underprovided within Audley, which would attract new upwardly mobile families to the area, particularly those who may be associated with the new employment allocation at Junction 16 of the M6.</p> <p>The site (as well as land beyond which is also within the ownership of our client as set out in Appendix B) would bring forward substantial benefits to Audley, Bignall End and the Borough as a whole and would align with the Government's aspirations to deliver 1.5 million homes during the next parliament.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>
<b>Comment ID</b>	NULLP934
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that: "A minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020 – 2040 which equates to 400 dwellings per annum." Notwithstanding the above, the draft National Planning Policy Framework identified that the Borough will need to deliver a further 193 dwellings per year in addition to this amount. Whilst this higher figure will not prejudice the progress of the emerging local plan, it does serve to demonstrate that additional housing will be required.</p> <p>The site at New Farm would make a contribution to the Council's housing provision. Our client is a well-established local house-builder with an excellent reputation for delivering high-quality housing schemes within the Borough.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>
<b>Comment ID</b>	NULLP936
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development

<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Please see attached representations. Audley and Bignall End are identified as Rural Centres that are expected to accommodate in the order of 250no. dwellings during the plan period. The draft Policy Map identifies that these can be provided across three sites in the northwest of Audley (sites AB15, AB32 and AB33) and Bignall End (site AB12).</p> <p>However, the provision of our client's site could enable the amount of land proposed across these sites to be reduced, thus reducing the overall impact on the Green Belt. The anticipated increased housing requirements for the Borough that are expected to come through the changes to the National Planning Policy provide an opportunity to accommodate more growth within and around this Rural Centre. The draft National Planning Policy Framework now acknowledged that there should be a focus on delivering sustainably located Green Belt sites (including greenfield sites) that do not contribute to the purposes of including land within the Green Belt. This will be explored in greater detail when commenting upon Draft Policy PSD5.</p> <p>Furthermore, the Regulation 19 Plan also seeks to allocate 80 hectares of new employment allocation at Junction 16 (Policy AB2 'Land at Junction 16 of the M6'). This allocation would be located around 1 mile from this site and would provide aspirational housing to attract future employees working at this strategic employment site.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>
<b>Comment ID</b>	NULLP940
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Manor View Care Home Ltd
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that:          "The Green Belt boundary is defined on the draft Policies Map."</p> <p>The Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment (November 2017) that was produced by Arup assesses the contribution that the individual parcels of Green Belt land have in respect to the five purposes of including them within the Green Belt, however the area of Green Belt covering is area of Audley was not assessed as part of that report. The Green Belt Assessment Part 2 considers our client's site which formed part of a wider site (identified as AB6) which runs up to the boundary with the A500 and contains land on both sides of the Alsager Road. When assessing this wider parcel of land, the Part 2= assessment considers that this site has a strong contribution when to one of the purposes (safeguarding against encroachment) but either moderate, weak or no contributions in respect of the other purposes. The assessment considers that this wider site has a strong degree of openness and has a less durable boundary between the site and the countryside. Clearly this assessment is based upon the wider site in general, and our client's site sits within a small element of this; is bounded by Cross Lane and other field boundaries as well as the approved 7no. dwelling scheme. The LVIA that supports the current planning application in fact demonstrates that views of the site are extremely limited to views from adjacent roads and the footpaths along the perimeter of the site.</p> <p>The subsequent Green Belt Assessment (Part 3) produced in 2023 does include an assessment of our client's wider site (as submitted through the Call for Sites process) which is given the reference 'AB79 - Land South of Cross Lane, Audley' (the westernmost element comprises the land that is subject to planning application 23/00522/FUL). Whilst the assessment of this wider site considers that it has an overall strong contribution to the purposes of including land within the Green Belt, it does acknowledge that the north and northwest boundaries with Cross Lane (where this development is located) "is durable and would prevent encroachment if it were developed".</p> <p>This, combined with the enabling development justification (which is advanced as part of the 23/00522/FUL planning application by heritage consultants HCUK), demonstrates that this site would be an appropriate location for housing to cross-fund the redevelopment of Madeley Manor. The provision of additional</p>

	<p>landscaped areas on the northeast and southeast of the site would amplify these defensible boundaries as well as assist to soften its impact upon the wider surrounding area as it matures.</p> <p>As stated previously in this report, the draft National Planning Policy Framework supports sustainably located sites (including Grey Belt sites) within the Green Belt to be used to deliver the identified housing growth. This site is considered to comprise a Grey Belt site given that it falls within the definition of “any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes”.</p> <p>It is considered that the site itself does not contribute towards the five purposes of the Green Belt as set out in paragraph 143 of the current National Planning Policy Framework as demonstrated below:</p> <p>a) “to check the unrestricted sprawl of large built-up areas” – The provision of this site as a housing allocation would not extend closer towards the Newcastle urban area and would therefore would not result in the increase in size of the Staffordshire conurbation.</p> <p>b) “to prevent neighbouring towns merging into one another” – The proposed allocation of this site would not reduce the gap between the other Audley Parish villages to the south of Audley.</p> <p>c) “to assist in safeguarding the countryside from encroachment” – The site would be reinforced by established, defensible boundaries and the proposed landscaping scheme shown in Appendix A illustrates how this would be further enhanced.</p> <p>d) “to preserve the setting and special character of historic towns” – Audley does not comprise a historic town.</p> <p>e) “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” – Audley and Bignall End contain very little derelict land that could realistically come forward to provide a housing scheme of a scale that would deliver economic, social and environmental benefits to the extent that this site would. The overall quantum of housing provided, whilst of a scale beneficial to Audley, would not conflict with the wider development strategy proposed under draft Policy PSD 1.</p> <p>In light of the above, it is considered that the allocation of this site would not contradict the five purposes of including land within the Green Belt.</p> <p>As a result, it is recommended that this site be also excluded from the Green Belt and instead allocated as a residential development.</p> <p>It has been demonstrated that there is a clear and robust argument in favour of removing New Farm, Cross Lane, Audley from the Green Belt and allocating it for residential purposes. The site would bring forward substantial benefits to Audley and the Borough as a whole (as demonstrated by the Economic Benefits Statement that was produced by Pegasus Group in support of planning application 23/00522/FUL) and would also facilitate the redevelopment of Madeley Manor to enable it to be conserved and put to a viable use consistent with its conservation for the foreseeable future. The proposal would provide much needed family housing which is currently underprovided within Audley, which would attract new upwardly mobile families to the area, particularly those who may be associated with the new employment allocation at Junction 16 of the M6.</p> <p>The site (as well as land beyond which is also within the ownership of our client as set out in Appendix B) would bring forward substantial benefits to Audley, Bignall End and the Borough as a whole and would align with the Government's aspirations to deliver 1.5 million homes during the next parliament.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the New Farm, Audley site should be included as a residential allocation in the Policies Map.
<b>Attachments</b>	<a href="#">1342417 Manor View Care Home New Farm, Cross Lane, Audley.pdf</a>



<b>Comment ID</b>	NULLP1391
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Marsh
<b>Consultee Given Name</b>	Marion
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1453
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Marsh
<b>Consultee Given Name</b>	Marion
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP992
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Mason
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b><u>Alsager Town Council's objections to the Emerging Newcastle-under-Lyme local Plan</u></b></p> <p>The strategic Employment site causing most concern for us is "AB2 - Land at J16 of the M6" in the Parish of Audley.</p> <p>Neither the local plan nor the strategic employment sites assessment document indicate the reasoning behind the location of the employment site nor the justification or factual evidence for the claimed number of jobs.</p> <p>An extract from Gov.uk on greenbelt land:  "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.  Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, "  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544486/2020-2021-local-authority-green-belt-strategy-and-2021-2026-local-authority-green-belt-strategy.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544486/2020-2021-local-authority-green-belt-strategy-and-2021-2026-local-authority-green-belt-strategy.pdf</a></p> <p>In our opinion the local plan does not set out the reasons for exceptional circumstances nor does it give full evidence of the need for the siting of this strategic employment site on 80 Ha (approx) of green belt land.</p> <p>It is also currently farmland with the potential to produce food. Preserving food security for UK should be the main priority.</p> <p>What the commercial business case for this location? No evidence has been provided to show that it is economically viable. If it is a trans-shipment centre, or a distribution centre, no case has been made to show it is located close to customers on a gravity led or hub and spoke principle. More evidence is needed.</p> <p>In addition, the employment site is located away from public transport and easy transport links other than the A500 and M6. There is a clear loss of hedgerows, biodiversity and habitat for many species of animals, insects and birds. This is a massive loss balanced against the siting of this strategic employment site. There doesn't seem to be any justification for choosing the location of this site other than its proximity to J16. It is simply identified as one of the strategic employment sites in the plan.</p> <p>Several public rights of way (Audley 8 and Audley 22) will be affected by this proposed site. Which is contrary to the statement above from gov.uk  A clear map needs to be shown of how they will be re-routed for all walkers and ramblers to use safely.</p> <p>Refencing statements from the local plan:  So, 80 HA land take for only 22HA of employment which seems very inefficient  And contradicts:  SE1 1d 1st bullet point: "Sustainable and active transport options: This includes promoting walking, cycling, public transport, and reducing the need for travel"  AB2 has no present access via public transport, or easy access via cycling. It is also too far away from any settlements to encourage workers to walk to work.  SE1 1d 3rd bullet point "Enhancement of green infrastructure: This includes utilising natural solutions like green spaces and vegetation to absorb air pollutants."  AB2 Removes 80 HA of green spaces and vegetation set alongside the M6 – a large source of air pollution. Moreover, AB2 would actively encourage further air pollution along the A500 and M6 – both attracting in more large scale traffic, and in use of cars for worker to attend this out of town site.  SE1 2a "Reducing emissions derived from vehicular travel by minimising the need to travel and maximising opportunities for more sustainable modes of travel including walking, cycling and public transport.  As above, AB2 would have the opposite effect.  SE1 2c "Identifying opportunities to protect and enhance ecosystems and the green infrastructure network to assist in the absorption of air pollutants"  As above, AB2 would seriously undermine this Sustainable Environment Policy.</p> <p>As can be seen from the accompanying diagram (at the end of this document), AB2 is clearly not "grey-belt" land; but rather, productive, good farmland. Last year, the UK lost 1% of its arable land. This was on top of the 1.1% that it lost the previous year*. This, at a time when the UK produces only 40% of its own food. Losing good quality land such as this is surely is surely bad for UK food security.  AB2 removes 80 HA of Green belt land, but only delivers 22HA of employment land, being far less efficient than other proposals in the study – and this, only IF the warehousing space is taken up by businesses.</p> <p>The documentation suggesting AB2 relies heavily upon advice from "SMD" - St Modwen Developments, one of the two development groups attempting to secure the area.</p>

SMD suggest that the AB2 site is a “weak” contributor to the Green Belt, and that if the land were built upon, it would somehow act to protect more sensitive Green Belt areas, and even goes so far as to suggest that there are “opportunities for Green Belt compensatory improvements in accordance with national policy”. However, the working for this is not shown in any way. The thinking involved belongs to SMD apparently, and not to Newcastle-Under-Lyme Council. The reasons for the site to be “weak” are not given, and neither are the “compensatory improvements” which have been suggested as feasible, nor the identity of the body which would be making those “improvements”.  
Is this pie in the Sky?

Surely these important details should be shared with the population before making such a devastating and unpopular decision. The draft report also suggests that development would “...not represent unrestricted sprawl, and it would have no impact on ... preserving the setting and character of a historic town”. However, as can be seen from the diagram, the AB2 site dwarfs Audley itself, and especially combined with two further developments in Audley itself, and housing along Park Lane – this rather certainly WOULD, in our view, constitute significant urban sprawl for the population of Audley.

AB2 on its own will dominate the view to the West of the town. The site is at the same elevation as Audley, to which several metres will be added by the size of the sheds – which are what warehouse are – lacking in architectural design features to make them pleasing to the eye.

Alsager has recently also had warehousing built on its periphery, against the wishes of Alsager Town Council, but presumably after similar recommendations (possibly from the same sources?). To date, after forcing a year of very bad traffic interruptions and congestion, the Warehouses have remained unused for the last 2 years. Apparently, they were not really so desired, after all.

The AB2 site also suffers from the same problem as the site for warehousing in Alsager. Whenever the M6 has a bad accident, traffic flees the M6 to the A500 and the surrounding roads. This causes huge congestions in and around Alsager approx. 3 times per year. Such blockages would undoubtedly be something that large warehouse businesses would like to avoid. The AB2 sites access appear to be from the A500, or from the B5500 (not connected to the M6) or from Park Lane via Audley – which will also have congestion as houses are built, and then congestion due to increased local car driving. Local roads which are not the A500 or the M6 are also too narrow and possibly not structurally capable of bearing the weight of large trucks – something highlighted recently when the B5078 was closed for weeks when work at Radway Green was undertaken.

\*<https://www.gov.uk/government/statistics/agricultural-land-use-in-england/agricultural-land-use-in-england-at-1-june-2024>

\*<https://www.gov.uk/government/statistics/agricultural-land-use-in-the-united-kingdom/agricultural-land-use-in-united-kingdom-at-1-june-2023>

So, our objections are;

- Loss of green belt land (80 Ha approx) for no justifiable reason or explanation of the exceptional circumstance that justify it, other than this is one of the stated strategic economic employment sites
- Inefficient use: 80 Ha identified but only 22Ha for employment.
- It is currently farmland with the potential to food for the UK
- No commercial case has been made for this location. No evidence presented to show that this location is economically viable or will provide the desired service for customers.
- Lack of public transport links, making it an inappropriate location
- lack of justification for its siting
- Lack of evidence or justification for the claimed number of created jobs
- Added air pollution
- Impact on an already over-busy and potentially dangerous roundabout at Junction 16. No planning is shown of how this roundabout will be modified to cope with the large volume of traffic that already uses this roundabout and the increase that would result should this employment site be developed.
- The impact this development will have on the parish of Audley in terms of noise, loss of amenity for local residents and an increase of traffic on already small and busy roads
- No obvious map of the re-routing of the affected public rights of way.

#### **In terms of relevance to Alsager (in other words - why are we objecting?)**

1 A very large scale warehousing development is already planned at Radway South on the B5078 - why is more needed at AB2 by J16 which is only a short distance away?

2 there is warehousing left empty in Alsager - what evidence is there to justify the claims made for the AB2 employment site in terms of take up and employment?

3 no traffic projections at J16 have been done or the impact the dualling of the A500 will have on J16. This will lead to an adverse experience of the motorists of Alsager who wish to access the M6 or A500 at J16.

4 Whilst it could be argued that it could provide employment for the people of Alsager, there is no guarantee that those jobs will be created. The same employment claim was made for the warehouses which are currently standing empty at Radway Green on the B5077

5 A Brownfield site should have been chosen of the AB2 strategic economic employment site rather than the green belt farmland, which once lost will never be recovered.

For the above reasons we wish to object to this local plan. In particular, we object to strategic employment site AB2

Documents referred to:

- Emerging Newcastle-under-Lyme local plan
- Strategic Employment sites Assessment -2024 update
- uk/greenbelt statistics for England 2020-21 and agricultural land in use 2023 and 2024



<b>Comment ID</b>	NULLP71
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Mason
<b>Consultee Given Name</b>	Mark and Lindsey
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <p>1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:</p> <ul style="list-style-type: none"> <li>The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.</p> <p>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>5. Policy PSD3: Distribution of Development (page 16)</p> <p>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>

<b>Q7 Modification</b>	<p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP72
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Mason
<b>Consultee Given Name</b>	Mark and Lindsey
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <p>1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:</p> <ul style="list-style-type: none"> <li>· The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.</p> <p>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>5. Policy PSD3: Distribution of Development (page 16)</p> <p>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p>

	6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.
<b>Q7 Modification</b>	<p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>

<b>Comment ID</b>	NULLP18
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Family Name</b>	Matcham
<b>Consultee Given Name</b>	Karen
<b>Q6 Details</b>	<p>Thank you for your email re local plan consultations. I will be honest I found all the information a little wordy which for me reduced clarity. I cant comment on the legality of the plans. However, I do have concerns and these concerns are shared by many . Unfortunately the perception is that these concerns aren't really being addressed in the building boom. I worry about the environment we are guardians of this panet ,we do not own it and therefore we need to consider future generations and other inhabitants. The pandemic highlighted the importance of green space which is now being destroyed. The new estates do not address the need for affordable and social housing. The councils can't afford to maintain the existing roads yet there are plans to increase the volume of traffic which will also increase congestion. The infrastructure is unable to cope with the current demand yet the plans will increase demand . The villages are merging losing their identity as a consequence. Pollution adds to health problems and the plans will add to the pollution but doesn't add to the infrastructure needed to deal with the consequence of noise,light,traffic pollution and congestion. Legality isn't the only framework that needs to be considered. There should also be a moral and ethical framework which omits entitlement.</p>

<b>Comment ID</b>	NULLP1228
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Matthews
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11(4)
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I wish to object to the housing development on land adjacent to park road on various issues. The forementioned land slopes sharply from Keele Road, down to Park Road and as such floods Park Road and on occasion, my property.</p> <p>Further consideration is that I have written rights to draw water from the stream adjacent to my property which feeds from the fields. The water is also in "Deed" as the primary source of the property.</p> <p>From the traffic issues, the racecourse is not a suitable access to the development which is considerably congested at most times and it seem ill thought out. I therefore object to the development.</p>
<b>Comment ID</b>	NULLP1232
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Matthews
<b>Consultee Given Name</b>	James
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11(4)
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I wish to object to the housing development on land adjacent to park road on various issues. The forementioned land slopes sharply from Keele Road, down to Park Road and as such floods Park Road and on occasion, my property.</p> <p>Further consideration is that I have written rights to draw water from the stream adjacent to my property which feeds from the fields. The water is also in "Deed" as the primary source of the property.</p> <p>From the traffic issues, the racecourse is not a suitable access to the development which is considerably congested at most times and it seem ill thought out. I therefore object to the development.</p>

<b>Comment ID</b>	NULLP1370
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Mayer
<b>Consultee Given Name</b>	Kevin
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1424
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Mayer
<b>Consultee Given Name</b>	Kevin
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1317
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p><b>Air quality</b></p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission.

Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)



For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,



where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use.
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
  2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1315
<b>Order</b>	16
<b>Title</b>	Vision for the Borough
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Vision
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>



unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

#### Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>



Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

**Policy SE8: Biodiversity and Geodiversity**  
 Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.  
 We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

**Policy SE10: Landscape**  
 Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.  
 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.  
 Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

**Policy SE11: Trees, hedgerows, and woodland**  
 Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

**Policy SE13: Soil and Agricultural Land**  
 Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)  
 Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.  
 The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.  
 Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

**Soil Plan Policies**  
 We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar



-Pasturefields Salt Marsh SAC

-Peak District Dales SAC

-Peak District Moors (South Pennine Moors Phase 1) SPA

-Severn Estuary SAC, SPA and Ramsar

-South Pennine Moors SAC

-West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

-Impacts on designated features affected by a possible deterioration in air quality

-Impacts on water quality and quantity associated with increased levels of built development.

-Impacts associated with increased recreational pressure at European sites; and

-Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI

•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1319
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>



decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site

contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

**Strategic Site Allocations**

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

**BL18 – Clough Hall Playing Fields, Talke**

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

**KL13 & KL15 – Land South of A525 between Keele University and Newcastle**

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

**HM28 – Land off East Lawns, Betley**

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

**LW53 – Loggerheads**

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

**SP11 – Former Keele Municipal Golf Course**

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

**AB2 – Land Adjoining Corner of A500 and M6 Southbound**

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: “Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible” (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that “The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area”. Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

**Policy PSD6: Health and Wellbeing**

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England’s People and Nature survey tells us that, for 82% of people ‘being in nature makes me happy’. With the cost-of-living crisis, ‘free’ places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential

direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.



Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,



Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

#### Q7 Modification

See attached representations

<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1323
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)



For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,

where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.



The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

• more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment. Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1327
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>

unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

Air quality

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.



Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound



Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

#### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

#### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

#### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

#### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).

-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.

-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).

-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.

-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

-Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).

-Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.

-Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

-In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)

-Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar

-Pasturefields Salt Marsh SAC  
 -Peak District Dales SAC  
 -Peak District Moors (South Pennine Moors Phase 1) SPA  
 -Severn Estuary SAC, SPA and Ramsar  
 -South Pennine Moors SAC  
 -West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares. Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below: Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface



	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1331
<b>Order</b>	92
<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN4
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>

decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.



The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site

contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

#### Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential

direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.



#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,

Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

#### Q7 Modification

See attached representations



<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1335
<b>Order</b>	125
<b>Title</b>	Policy SE13: Soil and Agricultural Land
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE13
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,



where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use.
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
  2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows



- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1321
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>

unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

#### Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>



Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very



high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

**Policy SE8: Biodiversity and Geodiversity**  
 Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.  
 We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

**Policy SE10: Landscape**  
 Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.  
 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.  
 Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

**Policy SE11: Trees, hedgerows, and woodland**  
 Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

**Policy SE13: Soil and Agricultural Land**  
 Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)  
 Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.  
 The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.  
 Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

**Soil Plan Policies**  
 We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar

-Pasturefields Salt Marsh SAC

-Peak District Dales SAC

-Peak District Moors (South Pennine Moors Phase 1) SPA

-Severn Estuary SAC, SPA and Ramsar

-South Pennine Moors SAC

-West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

-Impacts on designated features affected by a possible deterioration in air quality

-Impacts on water quality and quantity associated with increased levels of built development.

-Impacts associated with increased recreational pressure at European sites; and

-Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below: Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI

•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1325
<b>Order</b>	147
<b>Title</b>	Policy AB2 ‘Land at Junction 16 of the M6’
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>



decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site



contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

**Strategic Site Allocations**

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

**BL18 – Clough Hall Playing Fields, Talke**

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

**KL13 & KL15 – Land South of A525 between Keele University and Newcastle**

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

**HM28 – Land off East Lawns, Betley**

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

**LW53 – Loggerheads**

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

**SP11 – Former Keele Municipal Golf Course**

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

**AB2 – Land Adjoining Corner of A500 and M6 Southbound**

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

**Policy PSD6: Health and Wellbeing**

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential

direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,



Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

## Q7 Modification

See attached representations

<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1329
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p><b>Air quality</b></p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>



assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,

where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.



The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use.
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.



	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1333
<b>Order</b>	115
<b>Title</b>	Policy SE8: Biodiversity and Geodiversity
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE8
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>

unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound



Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

#### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

#### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

#### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

#### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.



-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).

-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.

-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).

-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.

-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

-Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).

-Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.

-Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

-In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)

-Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar

- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below: Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1337
<b>Order</b>	127
<b>Title</b>	Policy SE14: Green and Blue Infrastructure
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE14
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>

decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.



The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site

contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

#### Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential



direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,

Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

#### Q7 Modification

See attached representations



<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1318
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission.

Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives



Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that:

"The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,

where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use.
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
  2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows



- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1322
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>



unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very



high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

**Policy SE8: Biodiversity and Geodiversity**  
 Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.  
 We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

**Policy SE10: Landscape**  
 Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.  
 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.  
 Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

**Policy SE11: Trees, hedgerows, and woodland**  
 Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

**Policy SE13: Soil and Agricultural Land**  
 Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)  
 Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.  
 The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.  
 Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

**Soil Plan Policies**  
 We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).

-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.

-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).

-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.

-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

-Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).

-Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.

-Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

-In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)

-Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar



-Pasturefields Salt Marsh SAC

-Peak District Dales SAC

-Peak District Moors (South Pennine Moors Phase 1) SPA

-Severn Estuary SAC, SPA and Ramsar

-South Pennine Moors SAC

-West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

-Impacts on designated features affected by a possible deterioration in air quality

-Impacts on water quality and quantity associated with increased levels of built development.

-Impacts associated with increased recreational pressure at European sites; and

-Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI

•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1326
<b>Order</b>	101
<b>Title</b>	Policy SE1: Pollution and Air Quality
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE1
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>

decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site



contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

**Strategic Site Allocations**

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

**BL18 – Clough Hall Playing Fields, Talke**

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

**KL13 & KL15 – Land South of A525 between Keele University and Newcastle**

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

**HM28 – Land off East Lawns, Betley**

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

**LW53 – Loggerheads**

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

**SP11 – Former Keele Municipal Golf Course**

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

**AB2 – Land Adjoining Corner of A500 and M6 Southbound**

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

**Policy PSD6: Health and Wellbeing**

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential

direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.



Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,

Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

## Q7 Modification

See attached representations

<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1330
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p><b>Air quality</b></p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>



assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission.

Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)



For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,

where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.



	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1334
<b>Order</b>	119
<b>Title</b>	Policy SE10: Landscape
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE10
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>

unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.



Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA's and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

#### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

#### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

#### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

#### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.



-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).

-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.

-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).

-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.

-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

-Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).

-Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.

-Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

-In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)

-Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar

-Pasturefields Salt Marsh SAC

-Peak District Dales SAC

-Peak District Moors (South Pennine Moors Phase 1) SPA

-Severn Estuary SAC, SPA and Ramsar

-South Pennine Moors SAC

-West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

-Impacts on designated features affected by a possible deterioration in air quality

-Impacts on water quality and quantity associated with increased levels of built development.

-Impacts associated with increased recreational pressure at European sites; and

-Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI

•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface



	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1316
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Objectives
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>

decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site

contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

#### Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential



direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:  
 Play, naturally: a review of children's natural play  
 Nature for health and wellbeing | The Wildlife Trusts  
 Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.



#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,

Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

#### Q7 Modification

See attached representations

<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1320
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission.

Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives



Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 ([naturalengland.org.uk](https://naturalengland.org.uk))

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,



where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1324
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>



unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

**Air quality**

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

**'Best and most versatile' (BMV) agricultural land**

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>



Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

**Policy SE8: Biodiversity and Geodiversity**  
 Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.  
 We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

**Policy SE10: Landscape**  
 Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.  
 Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.  
 Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

**Policy SE11: Trees, hedgerows, and woodland**  
 Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

**Policy SE13: Soil and Agricultural Land**  
 Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)  
 Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.  
 The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.  
 Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

**Soil Plan Policies**  
 We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

-Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).

-Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.

-Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).

-Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.

-Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.

-Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).

-Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.

-Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites

-In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)

-Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar



-Pasturefields Salt Marsh SAC  
 -Peak District Dales SAC  
 -Peak District Moors (South Pennine Moors Phase 1) SPA  
 -Severn Estuary SAC, SPA and Ramsar  
 -South Pennine Moors SAC  
 -West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares. Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below: Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)

The SA recognises the local distinctiveness of the plan area;

"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)

Sets out the area specific barriers to achieving sustainable growth;

"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1328
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE4
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that “Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 “At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken.” Appendix A lists the local plans for neighbouring LPA’s concluding that ‘in combination’ with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected</p>



decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

#### Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

#### Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

#### Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site

contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

**Strategic Site Allocations**

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

**BL18 – Clough Hall Playing Fields, Talke**

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

**KL13 & KL15 – Land South of A525 between Keele University and Newcastle**

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

**HM28 – Land off East Lawns, Betley**

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

**LW53 – Loggerheads**

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

**SP11 – Former Keele Municipal Golf Course**

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

**AB2 – Land Adjoining Corner of A500 and M6 Southbound**

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

**Policy PSD6: Health and Wellbeing**

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential

direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.



Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan.

"The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.

2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:

- creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
- These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wyburnbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI,



Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

**Sustainability Appraisal**

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)

There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)

Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)

Considers the local and cumulative significance of soil loss alongside the ecological implications:

“Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)

A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)

**Other Advice**

Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment

#### Q7 Modification

See attached representations

<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1332
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE7
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.</p> <p>Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.</p> <p>Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?</p> <p>Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.</p> <p>Air quality</p> <p>Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.</p> <p>Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)</p> <p>Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:</p> <ul style="list-style-type: none"> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI</li> <li>•Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI</li> </ul> <p>The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH3 emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.</p> <p>Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NOx emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.</p> <p>Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of</p>

assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

Recreational Pressure

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in

Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

Other matters

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

Vision and Strategy

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

Strategic Objectives

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>  
IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scaill.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy "aims to protect the Borough's essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)".

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England's has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA's intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: "The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale...Three allocated sites (AB12, AB33 and TK10) are located in areas which make a 'strong' overall contribution to the purposes of the Green Belt where "the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose" (p101)

"Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a "requirement for project-level/site specific HRA's and targeted ecological surveys".

The Sustainability Appraisal concludes that:

"Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to 'The Butts and Hands Wood' ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

"Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of 'high' or 'very high' habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur"

"The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation" (p 216)

"The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)



For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following 'Strategic Site Allocations' which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound

Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

10 Infrastructure and Transport Policy.

Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site,

where site end users may rely upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

##### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

##### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Alington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

##### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

##### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.



The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use.
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

#### Policy SE14: Green and Blue Infrastructure

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows

- more sustainable management of existing woodlands and other habitats like grasslands These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

#### Habitats Regulations Assessment

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Pasturefields Salt Marsh SAC
- Peak District Dales SAC
- Peak District Moors (South Pennine Moors Phase 1) SPA
- Severn Estuary SAC, SPA and Ramsar
- South Pennine Moors SAC
- West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies "A long-term cumulative adverse effect ...in terms of water quality" (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that "the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in 'unfavourable' condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI."

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares.

Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King's and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process "the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects" and that "taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below:

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

#### Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

	<p>The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that "Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect" (p 142)</p> <p>The SA recognises the local distinctiveness of the plan area;</p> <p>"The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)</p> <p>Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)</p> <p>Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types." (p 20)</p> <p>Sets out the area specific barriers to achieving sustainable growth;</p> <p>"Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)</p> <p>Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)</p> <p>"The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, 'best and most versatile' (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough."(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications:</p> <p>"Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough's BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan." (p 59)</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>
<b>Comment ID</b>	NULLP1336
<b>Order</b>	121
<b>Title</b>	Policy SE11: Trees, hedgerows, and woodland
<b>Consultee Company / Organisation</b>	Natural England
<b>Consultee Position</b>	Senior Officer
<b>Consultee Family Name</b>	McLaughlin
<b>Consultee Given Name</b>	Sally
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE11
<b>Q6 Details</b>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment at this stage of the Local Plan and particularly supports the inclusion of policies on green and blue infrastructure, biodiversity, health and wellbeing, trees hedgerows and woodlands. We have reviewed the consultation documents and provide comments that relate to the soundness of the Local Plan and that are most relevant to our interest in the Natural Environment.</p> <p>Natural England has adopted a robust precautionary approach within this plan response. Whilst we welcome the content of the Local Plan, Natural England advises that the plan is currently at risk of being</p>

unsound and/or not legally compliant due to the potential impacts on air quality in relation to internationally designated nature conservation sites and the justification for the potential loss of 263ha best and most versatile (BMV) agricultural land. Further detail is provided below.

Natural England have also provided other advice within this submission relating to further improvements that could strengthen plan policies and specific strategic site options and related mitigation.

Do you consider that the Newcastle Under Lyme Plan is Sound and Legally Compliant?

Natural England notes that the plan is at the pre-submission stage and as such your authority is seeking confirmation on the soundness of the plan. Having reviewed the plan and supporting documents, Natural England considers the pre-submission plan in its current form is not sound or legally compliant, this is due to a lack of evidence with regards to air quality and the cumulative loss of BMV agricultural land both in a local and national context.

Air quality

Natural England notes that the Sustainability Appraisal states that "Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

As Natural England understands it the current evidence base used to conduct the HRA cannot rule out adverse impacts on designated sites. The HRA states at page 22 3.4.16 "At the time of writing, the traffic modelling run for the final suite of Regulation 19 allocations had not been undertaken." Appendix A lists the local plans for neighbouring LPA's concluding that 'in combination' with plans and projects (approved and those yet to be implemented) they may trigger in-combination effects on European sites as a result of air quality, particularly as we understand it in the key commuting areas.

Natural England notes that Annual Average Daily Traffic (AADT) data and traffic modelling in the Strategic Transport Assessment (STA) concludes a potential reduction in travel and related air pollution at allocated sites as a result of a predicted preference in the use of public transport. We are surprised by this projected decrease in both traffic and related air pollution, particularly as one employment allocation site includes a 200-bay lorry park and increased congestion is predicted at junction 16 of the M6 where it joins the A500 in a rural location with no existing rural transport provision. The Sustainability Appraisal also notes that: "There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work". (p 206)

Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot therefore currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

The HRA outlines that the main source of ammonia emissions is agricultural practice, and that material increases in NH<sub>3</sub> emissions are unlikely to be associated with the proposed local plan. At Black Firs and Cranberry Bog and Oakhanger Moss, any increase in nitrogen deposition has the potential to exacerbate pollution levels and thereby undermine the reasons for notification of these sites as a Ramsar.

Ammonia can be emitted from vehicle exhaust emissions as a by-product of the catalytic conversion process designed to reduce emissions of nitrogen oxide. As traffic composition transitions toward more petrol and electric cars (i.e., fewer diesel cars on the road), catalytic converters may aid in reducing NO<sub>x</sub> emissions but result in increased ammonia emissions. Ammonia emissions from road traffic therefore could make a significant difference to nitrogen deposition close to roads.

Natural England therefore advise that ammonia sourced from traffic emissions should be included for assessment within the local plan HRA, as the impact from this source on designated sites is currently unclear. For further information please see this report from Air Quality Consultants (AQC) that looks at ammonia emissions from roads for assessing impacts on nitrogen-sensitive habitats. Whilst we are aware that the current CREAM model created by AQC used to assess ammonia emissions from road traffic has not been peer reviewed, at this time it has been recognised as a Best Available Tool and we deem it appropriate to be used where any caveats associated with this model are also considered within the assessment. An assessment based on the best available approach is necessary. The next stage of assessment can then consider uncertainties in the model and site specifics to decide if mitigation needs to be considered.

Further work is therefore required to inform the Habitat Regulations Assessment. Natural England will engage with the Local Planning Authority in order to produce a Statement of Common Ground (SoCG) on this matter.

'Best and most versatile' (BMV) agricultural land

Natural England notes that "the proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land. A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services". (page 74 Sustainability Appraisal).

Under the Town and Country Planning (Development Management Procedure) (England) Order 2015 (DMPO) Natural England is a statutory consultee on development that would lead to the loss of over 20ha of 'best and most versatile' (BMV) agricultural land (land graded as 1, 2 and 3a in the Agricultural Land Classification (ALC) system, where this is not in accordance with an approved plan.

Natural England would like to understand how the local planning authority have produced the evidence base and options assessment which informs the strategic site allocations.

Natural England will engage with the local planning authority to consider the cumulative impacts of the loss of BMV both in the local and national context and the challenges related to environmental impact, infrastructure, and the requirement to deliver a balance between the need for development and the potential urbanisation of the countryside including the potential mitigation measures that need to be considered.

NPPF paragraph 174e states:

Planning policies and decisions should contribute to and enhance the natural and local environment by: ... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.



Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

Natural England provides guidance to inform further assessment of air quality and the loss of BMV agricultural land in our response to the content of the plans Strategic Policies as set out below.

Do you consider that the Newcastle-under-Lyme Borough Council Regulation 19 pre-submission draft Plan is compliant with Duty to Co-operate?

In terms of working with neighbouring authorities, Natural England notes that initially the plan was intended to be produced jointly with the City of Stoke-on-Trent, the plan does not however currently present an evidence base that demonstrates that a collaborative approach has been adopted and that the Duty to Co-operate has been fully complied with.

The Sustainability Appraisal states that: "Overall, there is potential for a cumulative adverse effect on biodiversity, owing to the fragmentation of the ecological network... Where a large amount of development is located on previously undeveloped land surrounding rural settlements, this is likely to produce a long-term irreversible negative cumulative effect regarding the urbanisation of the countryside" (p 71)

Natural England would therefore like to further understand how the areas identified to meet the City of Stoke-on-Trent's unmet employment needs are justified and appropriate and whether meeting some of the employment needs of the City of Stoke-on-Trent has led to the need to release or safeguard more land from the Green Belt in Newcastle under Lyme. If this is the case, what are the exceptional circumstances for doing this and how does this align with the allocated sites options assessment?

**Recreational Pressure**

In terms of the South Pennine Moors SAC and recreational impacts, the Local Plan does comply with the Duty to Co-operate. Natural England recommends that reference is made to the 'Recreation use of the South Pennine Moors and implications for strategic housing growth' report by Footprint Ecology Ref 778 date 27th March 2024. This report should both inform the evidence base and ensure that policies relating to open space/green infrastructure are as rigorous and robust as possible.

The report concludes that more data/evidence is required to determine if recreational use is causing an impact across to the South Pennine Moors and to get a better understanding of the scale and location of any impact. Natural England notes that the report records 7,000 additional dwellings in Newcastle-under-Lyme over the plan period rather than the 8,000 included in this regulation 19 submission. Newcastle-under-Lyme Borough Council should therefore continue to work with local authority and other partners to ensure coordinated and continued cross boundary action.

**Other matters**

Natural England has specific concerns related to allocations in the Green Belt. Notwithstanding that, Natural England considers most of the policies within the plan to be sound and deliverable. The plan is consistent with national policy with regard to those policies that are within Natural England's remit. Further information on strengthening policies including but not limited to Soils and best and most versatile (BMV) agricultural land, preventing loss and fragmentation of habitats and supporting green infrastructure are provided below.

**Vision and Strategy**

Natural England notes that the Plan's vision and emerging development strategy set out a framework for the future development of Newcastle-under-Lyme and addresses the needs in relation to housing, the economy, community facilities and infrastructure, including specific reference to a proposed employment site allocation.

This vision and the related objectives should also set out the environmental ambition for the plan area and form the basis for nature recovery and enhancement, supported by the policies and proposals in the plan.

Natural England advises that the vision should also incorporate more on the local ecology and landscape features which underpin local distinctiveness such as the "strong rural character with long open views across the surrounding rural landscape, towards more distant hills often framed by trees" (p 69) Part 3 Site Specific Landscape & Visual Appraisal. "Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms" (p 187) Sustainability Appraisal.

**Strategic Objectives**

Natural England welcome strategic objective SO-4 relating to carbon reduction and climate change, however we do not feel that this group of thirteen strategic objectives value or reflect the Boroughs whole ecology and landscape including but not limited to the protection of soil and best and most versatile (BMV) agricultural land. We would suggest that additional objectives are added relating to: air quality, water quality and quantity, soils and landscape.

Natural England would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature.

Air quality is a major threat to habitats and species. Many ecological sites are exceeding their critical loads and levels for ammonia, nitrogen deposition and acid deposition. The strengthening of the policies and the rationale behind site allocations within this plan will ensure that new development does not contribute to the further deterioration of habitats and species due to air pollution. Further advice on strengthening the plans evidence base with regards to air quality is provided in the links below:

Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001)

<http://publications.naturalengland.org.uk/publication/4720542048845824>

JNCC - Guidance on Decision-making Thresholds for Air Pollution: Main Report and Technical Report 2021

<https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>

CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts

<https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/>

IAQM Guidance

<https://iaqm.co.uk/guidance/>

Guidance- Air quality-Provides guidance on how planning can take account of the impact of new development on air quality.

<https://www.gov.uk/guidance/air-quality--3>

Clean Air Strategy 2019

<https://www.gov.uk/government/publications/clean-air-strategy-2019>

Apis

<http://www.apis.ac.uk/>

Ecosystem Services and air pollution impacts

Simple Calculation of Atmospheric Impact Limits

<http://www.scail.ceh.ac.uk/>

Strategic Policies

5 Planning for Sustainable Development

Policy PSD5: Green Belt

Natural England notes that this policy “aims to protect the Borough’s essential open spaces, prioritise the use of brownfield land, and guide potential future development in accordance with the National Planning Policy Framework (NPPF)”.

Natural England however notes that amendments to the Green Belt boundary are proposed in the form of 14 site allocations to accommodate both the growth requirements of the borough and the employment requirements of wider Stoke-on-Trent conurbation. Natural England’s has some site-specific concerns about the potential impacts of some of the green belt sites selected on the natural environment with regards to habitat loss, fragmentation and justification for the loss of BMV agricultural land.

We note the LPA’s intention to release and compensate for the loss of green belt and prioritise the use of suitable brownfield land. However, the site allocations in the green belt would result in the potential loss of 263ha of Best and Most Versatile (BMV) agricultural land. The council should satisfy itself that it is making a balanced decision for sustainable development, the Sustainability Appraisal concludes that: “The Green Belt Study assessed land parcels against the contribution they make to the five purposes of the Green Belt on a four-point scale... Three allocated sites (AB12, AB33 and TK10) are located in areas which make a ‘strong’ overall contribution to the purposes of the Green Belt where “the site contributes to the purpose in a strong and undeniable way, whereby removal of the site from the Green Belt will detrimentally undermine this purpose” (p101)

“Site allocations on previously undeveloped land or that would result in a net loss of GI / vegetation could result in a reduced capability of the environment to provide ecosystem services including carbon storage, the storage and filtration of water including natural flood protection, as well as reduced availability and connectivity of habitats within the green network enabling movement of species. (p 165)

Strategic Site Allocations

Natural England suggests that the HRA should include a “requirement for project-level/site specific HRA’s and targeted ecological surveys”.

The Sustainability Appraisal concludes that:

“Some 12 allocated sites partially coincide with priority habitats, where 3.43% of the total site allocation areas coinciding with priority habitats which include deciduous woodland, good quality semi-improved grassland and Site BL18 coincides with lowland fens which is a very high distinctiveness habitat in the BNG handbook (2024). These habitats can support a range of species of principal importance. Allocated Site KL15 is adjacent to ‘The Butts and Hands Wood’ ancient woodland, with a further 20 allocated sites located in close proximity to ancient woodlands. P158

“Six allocated sites (Sites CT20, HD10, KL13, RC8, SP11(2) and SP23) are located within areas of ‘high’ or ‘very high’ habitat distinctiveness that provide high biodiversity value. Whilst in many cases these habitats can be conserved alongside development, it is likely that in some cases fragmentation or loss of habitats and connections between habitats will occur”

“The majority of allocated sites are located on previously undeveloped land, which would result in the loss of soil resources and the ecosystem services they provide. (p 159) The development of new buildings on previously undeveloped land would be expected to result in a direct loss of soil resource, with little or no scope for mitigation” (p 216)

“The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution. (p 68)

For all sites, Natural England advises that the hydrological catchment within which the site sits is taken into consideration, with regards to the potential impact of the developments proposed on the adjoining watercourses and wider catchments, including but not limited to surface water runoff (including during construction), existing and required capacity of Waste Water Treatment Works (WwTW) and water supply and flooding issues. Each site will require site specific investigation, and the council should understand the impact of all the sites put forward individually and in combination.

Natural England has specific concerns and or requires further information about the following ‘Strategic Site Allocations’ which could potentially impact on designated sites as a result of air and water quality and/or lead to the loss and / or fragmentation of priority habitats and BMV agricultural land:

BL18 – Clough Hall Playing Fields, Talke

Natural England would like to further understand this larger residential development proposal with regards to the potential impacts on the lowland fen habitat.

KL13 & KL15 – Land South of A525 between Keele University and Newcastle

Natural England notes this proposal for Employment development is immediately adjacent to ancient woodland priority habitat.

HM28 – Land off East Lawns, Betley

Existing and projected water quality issues at Betley Mere will need to be considered with regards to this allocation.

LW53 – Loggerheads

Natural England notes this residential housing development proposal is located within the IRZ of protected sites (Burnt Wood SSSI) which states that development proposals of 50 or more homes outside existing settlements/urban areas in these zones should be consulted upon with Natural England.

SP11 – Former Keele Municipal Golf Course

This Larger residential development is categorised in the Landscape Assessment as having a Major adverse impact on the local Landscape.

AB2 – Land Adjoining Corner of A500 and M6 Southbound



Natural England notes this proposed employment allocation released entirely from the green belt, which comprises 70ha of grade 2 BMV agricultural land. The Landscape study concludes that the: "Proposed development scenario is likely to have a major adverse effect on the SA objective with no satisfactory mitigation possible" (p 15). With regards to potential Air Quality impacts on protected sites Natural England notes from the options analysis that "The loss or potential moving of a layby to enable access to the site could be problematic indicating potential issues with site access and traffic flow. An increase in HGV and personal vehicle traffic is anticipated, which could lead to potential congestion and air pollution in the area". Natural England would therefore also like to understand the evidence base further including the rationale for an alternative site TK30 @ Talke A34 / A500 roundabout being ruled out.

#### Policy PSD6: Health and Wellbeing

Natural England welcome this policy direction in terms of safeguarding health and amenity and supporting healthy communities, through the protection and provision of high-quality open spaces, including allotments and the promotion of active travel transport choices. Further information on joining up Nature Recovery and Green Infrastructure (GI) with health priorities is set out below. If more cities and towns can be creatively designed and managed, with nature and communities at their heart, we will see nature and people thrive. This is something we set out to inspire at Natural England when developing the Green Infrastructure Framework and Design Guide. Natural England's People and Nature survey tells us that, for 82% of people 'being in nature makes me happy'. With the cost-of-living crisis, 'free' places like local parks and greenspace, have become even more important. The value of these spaces for the economy is estimated at £28.7 billion per year.

Green infrastructure in towns and cities provides places to relax, exercise, and spend time outdoors; cools urban areas; reduces flooding by allowing water to permeate the ground rather than overwhelm our drains; increases biodiversity and helps to reduce inequalities in access to nature. Options assessments for development sites and related green and blue Infrastructure within and between developments, green spaces and designated sites should; include soft transition and consider potential direct and indirect implications on sustainable use for example visitor pressure and transport / access options.

The natural environment affords the best 'natural' play opportunities for children while offering multifunctional nature-based solutions to climate change etc. These can be blended into wildlife rich green infrastructure and green open spaces that can act as destination play sites for local children (See best practice at Play England and Play Wales ) that have proven health and wellbeing value.

Evidence for nature play and health:

Play, naturally: a review of children's natural play

Nature for health and wellbeing | The Wildlife Trusts

Good practice in social prescribing for mental health: the role of nature-based interventions - NECR228 (naturalengland.org.uk)

#### 6 Climate and Renewable Energy

Whilst Natural England welcomes this group of policies we recommend including Policy CRE1: Climate Change and Policy CRE2: Renewable Energy within the Sustainable Environment (SE) group of policies to achieve a collective strategic focus on sustainable development and working toward achieving net zero alongside the SE policies relating to Pollution and Air Quality (SE1) and requirements for sustainable water management measures to reduce water use, natural flood protection features alongside the specific policies on Sustainable Drainage Systems (Policy SE4:)

Natural England continues to work with the LPAs across the region on understanding air pollution across area boundaries (see comments and links in objectives section.)

#### 10 Infrastructure and Transport Policy.

##### Policy IN4 Cycleways, Bridleways and Public Rights of Way

Natural England welcomes the inclusion of this group of policies which seek to maintain and enhance the network of public rights of way that cross the borough. We note that the sustainability appraisal states that "the borough has relatively poor accessibility to the cycle network and is the lowest performing in the county for walking zones" (p 206) and that, "eight allocated sites (AB2, AB12, AB33, HD10, KL15, MD29, SP11(3) and TK10) do not currently have safe pedestrian or cycle access adjacent to the site, where site end users may be reliant upon less sustainable modes of transport including private car use". (p 180)

#### 11 Sustainable Environment

Natural England welcomes this group of policies and has the following policy specific comments:

##### Policy SE1: Pollution and Air Pollution.

Natural England welcomes this policy that notes that development proposals which are likely to result in detrimental impacts on air quality, will not be permitted unless it can be demonstrated that mitigation measures effectively address these impacts. (Comments on Air Quality are also provided on page 2 and 4 of this letter). The promotion of sustainable and active travel options, low-emission technologies and enhancement of green infrastructure to absorb air pollution is also noted. (see comment above re integrating the group: 6 Policies Climate and Renewable Energy).

##### Policy SE7: Biodiversity Net Gain

Natural England supports the inclusion of a policy on BNG. We suggest the following minor amendments to further improve the plan policy.

The BNG policy should make it clear that biodiversity net gain is not applied to irreplaceable habitats, and that any mitigation and/or compensation requirements for Habitats sites should be dealt with separately from biodiversity net gain provision. The policy should also set out how biodiversity net gain will be delivered and managed through the lifetime of the scheme and including monitoring requirements. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

Natural England notes that the Sustainability Appraisal states "Despite the BNG provisions at the site level, there remains potential for a cumulative adverse impact on biodiversity at the landscape scale, owing to incremental habitat losses. As a result of development within the Local Plan undeveloped land will be lost which will include the loss of soil resources, habitats recognised as being of 'high' and 'very

high' distinctiveness, and potentially ecological links between biodiversity assets, whereby the policies will not be expected to fully mitigate the fragmentation of the ecological network. Fragmentation of the ecological network across Newcastle-under-Lyme is expected to be a long-term and permanent significant effect." (p 162)

#### Policy SE8: Biodiversity and Geodiversity

Natural England supports the inclusion of this policy to protect the Boroughs internationally, nationally and locally designated sites important for their biodiversity value and to enhance the natural environment and work with partners toward Nature Recovery.

We particularly welcome the plans recognition of the value of "wider ecological networks" stating that "Other sites, both individually and collectively, that are not designated can also contribute towards protecting and enhancing diversity of species locally".

#### Policy SE10: Landscape

Natural England welcomes this policy aimed at ensuring that "development proposals should protect and enhance the character, quality, beauty, and tranquillity of the Borough". We note from the sustainability appraisal that "The entirety of the south of the borough is identified as being high in relation to landscape sensitivity, which starts in Audley in the north and covers the southern area of the borough, including Loggerheads and Almington." We agree that "Alteration of the landscape character is a long-term and permanent significant effect... There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan". (p193) SA.

Natural England has divided England into 159 distinct natural areas called National Character Areas (NCAs) Newcastle-under-Lyme falls within two NCAs: Shropshire, Cheshire and Staffordshire Plain: gently rolling plains dominated by intensive dairy farming, beef and arable production; The Potteries and Churnet Valley: strong contrast between the industrialised landscape of the Potteries and the pastoral, strongly dissected hills and small plateaux that flank the Churnet and Dove valleys.

Natural agrees with the following statement in the sustainability appraisal: "Although various policies aim to ensure that development conserves and enhances landscape character and distinctiveness, when combined with Local Plan policies that support infrastructural improvements such as for transportation, water, and waste, this is likely to lead to a long-term and irreversible cumulative adverse effect on landscape character and tranquillity and associated indicators such as dark skies." (p72)

#### Policy SE11: Trees, hedgerows, and woodland

Natural England welcomes this plans recognition that "Trees, hedgerows, and woodlands are integral to the distinctive character and ecological health of the Borough of Newcastle-under-Lyme, defining landscapes across both urban and rural settlements." And that "This policy prioritises the protection of existing natural assets, seeking to not only preserve, but actively enhance, these valuable features wherever possible".

#### Policy SE13: Soil and Agricultural Land

Natural England has concerns about the justification for the loss of BMV agricultural land within this plan. "The proposed site allocations in this Local Plan are likely to cumulatively result in the loss of up to 342ha of previously undeveloped land, A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of 'best and most versatile' (BMV) agricultural land, which is likely to result in a long-term, irreversible cumulative adverse effect on ecosystem services." (page74) (SA)

Natural England notes that policy SE13 states: "Outside of sites allocated for development in the Local Plan, development proposals should avoid the loss of best and most versatile agricultural land (BMV) unless it can be demonstrated that the benefits of development clearly outweigh the loss of the land and every effort has been made to mitigate for the overall impact of the development on best and most versatile agricultural land."

With regards to Soil and Agricultural Land Quality, Natural England advises that The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to:

- protect the best agricultural land
- put a value on natural capital, including healthy soil
- ensure all soils are managed sustainably by 2030
- restore and protect peatland

Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon and water, the infiltration and transport of water, nutrient cycling, a buffer against pollution and provision of food. In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised.

The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 180(a), 180(b) and 181 (footnote 62). When planning authorities are considering land use change, the permanency of the impact on soils is an important consideration. Particular care over planned changes to the most potentially productive soil is needed, for the ecosystem services it supports including its role in agriculture and food production.

Plan policies should therefore take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 180(b) of the NPPF.

#### Soil Plan Policies

We strongly advise that at a minimum, the plan includes core policies for:

- the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and
- for the protection of and sustainable management of soils as a resource for the future.

- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Conforms to NPPF and Planning Practice Guidance (Natural Environment and Minerals).
- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- Recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils.
- Soils of high environmental value (e.g., wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) should also be considered as part of ecological connectivity (Nature Recovery Network / Green Infrastructure).
- Requires soil handling and sustainable soil management strategies based on a detailed assessment of the soil resource based on best practice guidance (for all sites larger than 5 ha), ideally as part of the planning application process for major sites to help inform master-planning, and to safeguard the continued delivery of ecosystem services through careful soil management and appropriate, beneficial soil re-use. Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- In addition, for minerals and other temporary forms of development, plans for reinstatement, restoration and aftercare will be required (or for solar, a commitment to do so if the operational life is in decades); normally this will be return to the former land quality (ALC grade)
- Refers to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.

**Policy SE14: Green and Blue Infrastructure**

Natural England supports this policy. Well-designed cross boundary multi-functional green infrastructure contributes greatly to a number of benefits both for people and nature. Your green and blue (for example cross boundary canals) infrastructure should dovetail with your biodiversity net gain strategies to maximise benefits.

We would advise that the Local Authority also considers Natural England's Green Infrastructure Framework of Principles and Standards for England. As stated in our document, "Green infrastructure (GI) is part of the solution to many of the challenges we face; health inequalities, biodiversity crisis, climate change, nature recovery and levelling up. The GI framework supports local authorities, developers, parks and greenspace managers and local communities to enhance and create new good quality green infrastructure."

We would also suggest reference is made to the emerging Local Nature Recovery Strategy. Preparing Local Nature Recovery Strategies (LNRS) is a statutory requirement under the Environment Act 2021. LNRS are designed to work closely alongside other measures in the Act including supporting the delivery of mandatory biodiversity net gain and providing a focus for a strengthened duty on all public authorities to conserve and enhance biodiversity. They will also underpin the Nature Recovery Network, alongside work to develop partnerships and to integrate nature into our incentives and land management activities. Each LNRS will be specific and tailored to its area. The responsible authorities and people involved in preparing a strategy can choose how they want it to look, but every strategy must contain:

1. A local habitat map.
2. A written statement of biodiversity priorities. Statutory guidance for responsible authorities explains in detail what these 2 things should contain. Together they set out what the strategy is aiming to achieve and what practical actions will help do this. They will also propose where actions could be carried out for best effect and to connect and expand existing areas that are important for nature. We expect local nature recovery strategies to propose actions such as the:
  - creation of wetlands
  - restoration of peatlands
  - planting of trees and hedgerows
  - more sustainable management of existing woodlands and other habitats like grasslands
 These actions are intended to help nature itself and to also help improve the wider natural environment.

Whilst the Staffordshire Local Nature Recovery Strategy (LNRS) is currently a work in progress, Newcastle-under-Lyme Borough Council Regulation 19 pre-submission should still be consistent with NPPF Paragraph 185 in terms of setting out local habitat priorities and identifying potential measures by which they can be achieved, alongside mapping areas that could become of particular importance in the future.

Natural England encourages Newcastle Under Lyme Borough Council via their Local Nature Recovery Strategy to actively develop cross border cooperation between other Local Planning Authorities (LPA) (for example Staffordshire Moorlands Borough Council) in coordinating land development projects that impact on local biodiversity sites to ensure that local biodiversity corridors are maintained and link up other local important sites for nature conservation.

This is a good way of achieving nature recovery and preparing to deliver the LNRS alongside enabling the local authority and its partners to identify, map and safeguard site areas, including green and blue infrastructure opportunities and interlinkages.

**Habitats Regulations Assessment**

Natural England notes that this Local Plan is not directly connected with or necessary to the management of any European site. A screening assessment has been undertaken which identified a number of Likely Significant Effects (LSE) associated with the Local Plan. Taking no account of mitigation measures, the HRA concludes that Local Plan has the potential to affect the following European sites:

- Cannock Chase SAC
- Humber Estuary SAC, SPA and Ramsar
- Mersey Estuary SPA and Ramsar
- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar

-Pasturefields Salt Marsh SAC  
 -Peak District Dales SAC  
 -Peak District Moors (South Pennine Moors Phase 1) SPA  
 -Severn Estuary SAC, SPA and Ramsar  
 -South Pennine Moors SAC  
 -West Midland Mosses SAC

We welcome that your HRA includes the Humber Estuary SAC, SPA and Ramsar site which is hydrologically connected to the river Trent. If the Local Plan resulted in significant water pollution, this European site could be affected and has therefore been screened in, in relation to water quality only, on a precautionary basis. Natural England however notes that the Sustainability Appraisal identifies “A long-term cumulative adverse effect ...in terms of water quality” (p 148) as a result of the plan, this is not fully reflected in the current HRA.

Natural England note that the Sustainability Appraisal states: that “the entirety of the borough falls within IRZs of one or more SSSIs. All five SSSIs within the borough are in ‘unfavourable’ condition: Burnt Wood SSSI, Maer Pool SSSI, Black Firs and Cranberry Bog SSSI (Midlands Meres and Mosses Phase 2 Ramsar), Betley Mere SSSI (Midlands Meres and Mosses Phase 1 Ramsar) and Metallic Tileries, Parkhouse SSSI.”

Natural England are also aware of the extensive network of ancient woodland spread across the borough, totalling 707.60 hectares, as well as a large quantity of priority habitats, totalling 1,791 hectares. Natural England agree that the following designated sites and related priority habitats in adjoining LPA areas may also be affected by development through several pathways, including fragmentation, recreational pressure and/or pollution (including Air and Water Quality). Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI, Wybunbury Moss SAC SSSI, Tyrley Canal Cutting SSSI, King’s and Hargreaves Wood SSSI, Gannister Quarry SSSI, Roe Park Woods SSSI, Wetley Moore SSSI, Churnet Valley SSSI, Hatherton Flush SSSI, Sounds Heath SSSI, Ford Green Redebed SSSI, and Cop Mere SSSI.

It is noted that the Appropriate Assessment stage of the HRA assessed potential impacts by topic;

- Impacts on designated features affected by a possible deterioration in air quality
- Impacts on water quality and quantity associated with increased levels of built development.
- Impacts associated with increased recreational pressure at European sites; and
- Consideration of impacts at associated functionally linked land.

Natural England notes that the HRA also factored the following into the assessment process “the protective framework provided by the Local Plan and existing protection measures set out in high level strategic policy and existing planning policy frameworks that serve to help overcome the identified potential adverse effects” and that “taking into consideration these factors, it is concluded that the Local Plan would have no adverse impact on site integrity at any European site, either alone or in-combination.

Natural England disagree agree with this conclusion that for those Habitats sites in the area of search with features sensitive to air pollution, adverse effects on their integrity, alone or in-combination, can be ruled out for the reasons set out at the beginning of this letter on page 2 and repeated in part below: Cumulative adverse effects on integrity in relation to air quality as a result of this plan and neighbouring LPAs plans cannot currently be ruled out at the following internationally designated sites:

- Midlands Meres and Mosses Phase 2 Ramsar - Black Firs and Cranberry Bog SSSI
- Midlands Meres and Mosses Phase 2 Ramsar - Oakhanger Moss SSSI

Natural England are currently in discussion with a number of the Staffordshire and West Midlands LPA's with regards to the cumulative impacts of air quality. We advise that further work is required to inform the HRA. The HRA should demonstrate that there are no adverse effects on integrity of Habitat sites as a result of this Local Plan, alone and in combination with other plans and projects. With regards to allocated sites, it is unclear whether the individual sites put forward in the Local Plan have been assessed through the Habitat Regulations Assessment process and how mitigation will be applied here.

Sustainability Appraisal

Natural England has reviewed the Sustainability Appraisal (SA) and included comments taken from the document throughout our response.

The SA is a comprehensive document which should be reviewed in strengthening the HRA, particularly with regards to residual adverse effects that would be expected to remain in terms of wastewater following the implementation of the Local Plan policies. (p 141) Natural England notes that “Increased pressure on wastewater treatment has the potential to be a long term and potentially permanent significant effect” (p 142)

The SA recognises the local distinctiveness of the plan area;

“The Borough itself is largely rural in nature and supports some high-quality agricultural land, but is more heavily built up towards the north east surrounding Stoke-on-Trent. (p 8)

Newcastle-under-Lyme has a strong rural character with a high-quality landscape and countryside, with some areas identified as being sensitive to change as a result of new development. (p 19)

Tranquillity, ancient woodland, deciduous woodland, and strong undulating landforms make up the key features of some of these Landscape Character Types.” (p 20)

Sets out the area specific barriers to achieving sustainable growth;

“Although various Local Plan policies aim to reduce air pollution and promote sustainable modes of transport, the introduction of 8,000 dwellings and 63ha of employment floorspace is expected to increase vehicle emissions in the Plan area and result in an overall reduction in air quality. (p 67)

Loss of tranquillity The proposed development of 8,000 new dwellings and 63ha of new employment land across the borough, with a number of development sites located within more rural areas, is likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.(p 68)

“The pre-mitigation SA assessments identified negative impacts in relation to air quality due to the proximity of sites to major roads, landscape character due to the location of sites within areas of high landscape sensitivity, close proximity to the PRoW network and potential for coalescence and urban sprawl, habitat sites, priority habitats, habitat distinctiveness, loss of undeveloped land, ‘best and most versatile’ (BMV) agricultural land, coinciding with mineral safeguarding areas (MSAs) and areas of surface

	<p>water flood risk (SWFR); and access to healthcare facilities, schools, the local cycle network and railway network. (p 40)</p> <p>There is a low uptake of sustainable modes of transport in the borough, with private car use being the most popular method of travel when commuting to work. (p 21)</p> <p>Trends in transport choice are unlikely to change significantly, and private car use would continue to increase as the selected method of transport to work, with potential adverse impacts on air quality in the borough.”(p 23)</p> <p>Considers the local and cumulative significance of soil loss alongside the ecological implications: “Loss of soil resources, BMV land and ecosystem services The proposed allocations would cumulatively result in the loss of up to approximately 342ha of previously undeveloped land, including up to 263ha of BMV agricultural land. The proposed development would be expected to reduce the ability of the local soil biome to effectively provide ecosystem services, to some extent. Additionally, the loss of permeable soils could potentially increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on agricultural yield.(p 68) The majority of the borough is ALC Grade 3 soil, with areas of ALC Grade 2 scattered across the borough. Grade 2 and potentially Grade 3 represents some of the borough’s BMV agricultural land and should be conserved wherever possible (p 21)</p> <p>A total of 20 of the allocated sites contain areas of ALC Grades 1, 2 or 3 within the site area, leading to potential for up to 263ha of BMV land to be lost as a result of the development proposed in the Local Plan.” (p 59)’</p> <p>Other Advice</p> <p>Further general advice is provided within Natural England Advice Note – Local Plans February 2024, attached at (Appendix A) - see attachment</p>
<b>Q7 Modification</b>	See attached representations
<b>Attachments</b>	<a href="#">1364617 Natural England.pdf</a>



<b>Comment ID</b>	NULLP943
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	McManus
<b>Consultee Given Name</b>	Rob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I feel very frustrated that “green belt” land appears to have become meaningless. The quality of life for people living in Audley, Bignall End and the surrounding area will no doubt deteriorate, if this “green belt” land is sacrificed.</p> <p>Also the inevitable increase in the local population will put even more pressure on the local services such as the Medical centre, Dentist and the restricted parking availability.</p> <p>If this application is passed, it can only damage the lovely village community we have here.</p>
<b>Comment ID</b>	NULLP945
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	McManus
<b>Consultee Given Name</b>	Rob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>I feel very frustrated that “green belt” land appears to have become meaningless. The quality of life for people living in Audley, Bignall End and the surrounding area will no doubt deteriorate, if this “green belt” land is sacrificed.</p> <p>Also the inevitable increase in the local population will put even more pressure on the local services such as the Medical centre, Dentist and the restricted parking availability.</p> <p>If this application is passed, it can only damage the lovely village community we have here.</p>
<b>Comment ID</b>	NULLP942
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	McManus
<b>Consultee Given Name</b>	Rob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I feel very frustrated that “green belt” land appears to have become meaningless. The quality of life for people living in Audley, Bignall End and the surrounding area will no doubt deteriorate, if this “green belt” land is sacrificed.</p> <p>Also the inevitable increase in the local population will put even more pressure on the local services such as the Medical centre, Dentist and the restricted parking availability.</p> <p>If this application is passed, it can only damage the lovely village community we have here.</p>
<b>Comment ID</b>	NULLP944
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	McManus
<b>Consultee Given Name</b>	Rob
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I feel very frustrated that “green belt” land appears to have become meaningless. The quality of life for people living in Audley, Bignall End and the surrounding area will no doubt deteriorate, if this “green belt” land is sacrificed.</p> <p>Also the inevitable increase in the local population will put even more pressure on the local services such as the Medical centre, Dentist and the restricted parking availability.</p> <p>If this application is passed, it can only damage the lovely village community we have here.</p>



<b>Comment ID</b>	NULLP1405
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	McMillan
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b> Please add this document to my previous objections</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1348
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	McMillan
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b> <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a</p>

	<p>footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1347
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	McMillan
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1404
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	McMillan
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b> PLEASE ADD THIS TO MY PREVIOUS OBJECTIONS</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1343
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Ross
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1402
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Ross
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

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The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

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Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

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Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

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The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

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	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1344
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Ross
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I was not made aware of any consultation in respect of the local plan for housing development. I never saw the regulation notices posted, and I imagine neither did the majority of people in the village, because of where they had been pinned. There should have been meetings organised by the council where we could have been properly advised and informed about planned proposals and policies.</p> <p>We are the residents and we have very serious and genuine concerns about this. I wasn't even aware that I needed to make further responses to the final local plan until a friend told me, who had heard this from someone else.</p> <p>I fully endorse the attached response form which outlines the objections to the local plan i.e. green belt - unsound  historic mining - therefore- unsound  land ownership - unsound  infrastructure - unsound</p>

<b>Comment ID</b>	NULLP1345
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Samantha
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1346
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Samantha
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I was not made aware of any consultation in respect of the local plan for housing development. I never saw the regulation notices posted, and I imagine neither did the majority of people in the village, because of where they had been pinned. There should have been meetings organised by the council where we could have been properly advised and informed about planned proposals and policies.</p> <p>We are the residents and we have very serious and genuine concerns about this. I wasn't even aware that I needed to make further responses to the final local plan until a friend told me, who had heard this from someone else.</p> <p>I fully endorse the attached response form which outlines the objections to the local plan i.e. green belt - unsound  historic mining - therefore- unsound  land ownership - unsound  infrastructure - unsound</p>

<b>Comment ID</b>	NULLP1403
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Medlock
<b>Consultee Given Name</b>	Samantha
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street</p>

	<p>has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1353
<b>Order</b>	105
<b>Title</b>	Policy SE3: Flood Risk Management
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SFRA
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	We recommend you provide an SFRA update to support your site selection.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1379
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Section 3: Policy advises that residential developments should be designed to achieve a maximum of 110 litres per person per day in line with the optional standard of Building Regulations, part G. This doesn't reflect recommendations within the Water Cycle Study.</p> <p>Water Cycle Study (MEN-JBAU-XX-XX-RP-EN-0001-D1-C01-Water_Cycle_Study, issue date 22.7.2024). Section 4.7.3 highlights that Severn Trent Water supply area is defined as being under 'serious' water stress (see EA Water Stress Areas Classification: <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a>)</p> <p>Recommendations within WCS for mitigating future water stress outlined in Table 4-3 Recommendations for water resources: recommends that policy should require a water efficiency standard of 100l/p/d.</p> <p>The Government's Environmental Improvement Plan (section 3.7.2) commits to considering a new standard for new homes in England of 105lts/p/d and 100l/p/d where there is a clear local need. The WCS indicates that it is likely that this or similar standards will be adopted.</p> <p>The policy should, therefore, allow for a future reduction in the water efficiency target.</p>
<b>Q7 Modification</b>	Policy should be updated to reflect a tighter water efficiency standard as detailed within the recommendations of the WCS.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1383
<b>Order</b>	109
<b>Title</b>	Policy SE5: Water Resources and Water Quality
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE5
<b>Q6 Details</b>	<p>Final Draft Local Plan Representation</p> <p>Environment Agency response dated 2/10/24. –<b>Water Cycle Study Evidence Base – waste water and quality.</b></p> <p>We previously sought the submission of a Water Cycle Study (WCS) update to address some wastewater infrastructure issues.</p> <p>For completeness, our Regulation 18 response (14 August 2023) included:</p>

**Waste water infrastructure:** “Your water cycle study should ensure that your strategic growth can be accommodated in consideration of waste water infrastructure. Information on local treatment works and their ability to accommodate housing and employment growth is set out in the WCS. This looks at physical capacity issues (e.g. network pipes) and environmental capacity (water quality of treated effluent) issues. Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company and we have developed some general questions to assist this process (below). The outcome of this may inform a ‘phasing’ policy within your plan where appropriate. It may also be necessary to produce an ‘Infrastructure Delivery Plan’ to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is ‘sound’. Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to “ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making”. Plans should be “deliverable”. The WCS highlights that as a result of planned growth increased discharges at the wastewater treatment works may lead to a deterioration in water quality in the receiving waterbodies. As such, the WCS recommends a water quality impact assessment is undertaken through a Phase 2 Water Cycle Study. This does not yet appear to form part of the evidence base to support the local plan. To ensure a sound plan this should be provided to inform appropriateness and deliverability of sites”.

#### Latest Water Cycle Study

We note the submission of the updated WCS (July 2024), JBA, reference MEN-JBAU-XX-XX-RP-EN-0001 Revision D1.C01.

With regard to wastewater treatment and water quality we are not in a position to make a detailed assessment at this time. However, we have done a high-level review of the report and make the following comments.

The JBA headroom assessment identified Waste Water Treatment Works (WwTW) which have limited treatment capacity during the plan period. It suggests Severn Trent Water and United Utilities highlighted upgrades to these works are planned in the short term to increase capacity. As such, treatment capacity should not be a constraint to growth in the borough.

The report details the STW plan, highlighting that WwTW improvement works are planned in AMP8 (2025 to 2030) for Baldwin's Gate WwTW. Improvement Works are a long-term priority for Strongford and Ashley, spanning from 2020 to 2050. Loggerheads Sanatorium was identified for WwTW Improvement Works as a focus between 2030 and 2050.

**We support JBA recommendations in section 8.7 (page 81) and would advise that you consult with Severn Trent Water and United Utilities who are the operators of the WwTWs serving growth across the borough; to ensure that provision of WwTW capacity is aligned with delivery of development. This will inform your plan phasing and infrastructure plan delivery.**

We acknowledge the Water Quality assessment within the WCS.

This considers the increase in the discharge of effluent from WwTW as a result of development and growth in the area. Under the Water Framework Directive (WFD), a watercourse is not allowed to deteriorate from its current WFD classification (either as an overall watercourse or for individual elements assessed).

As the WCS confirms, a new/variation to the Environmental Permit (EP) may be required (from the Environment Agency) for the WwTW to improve the quality of the final effluent, so that the increased pollution load will not result in a deterioration in the water quality of the watercourse. This is known as "no deterioration" or "load standstill". The need to meet river quality targets is also taken into consideration when setting or varying a permit.

The WCS has considered this in section 9.2 onwards.

We have not reviewed the modelling but note that there were 'no significant deteriorations' found in the WFD assessment which JBA suggest can't be prevented by improved treatment standards. There are no red GES assessment outcomes, which indicates growth alone would not prevent achievement of good ecological status in future across the borough.

Baldwins Gate is identified as an 'amber site' where the WCS suggests - Proposed development can be accommodated with a tighter permit and upgrade to treatment. This is achievable with current technology.

We support the recommendation in section 9.8 – “You should liaise with STW to determine whether Baldwins Gate WwTW upgrades planned in AMP8 (2025 to 2030) will prevent >10% deterioration of river Ammonia concentration”. As your WCS suggests – “The timing of occupation of potential allocation 'Land at Baldwins Gate Farm, Site B (LW74)' is significant here, as it has a relatively high number of dwellings proposed (200). As such, it is likely the cause of deterioration”.

You could include this in the reasoned justification for that allocation and/or your Infrastructure Plan.

Other adopted plans have included text such as – ‘Proposals within areas of infrastructure capacity constraint, as identified by the Water Cycle Study (and any major development) demonstrates that there is adequate water infrastructure in place to serve the development’.

<b>Comment ID</b>	NULLP1359
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Environment Agency

<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	TB23 & SP23
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>TB23 &amp; SP23</p> <p>In our letter of 14th August 2023 in response to the Reg 18 draft local plan consultation, we highlighted that the list of proposed sites does not fully identify site vulnerabilities in terms of land contamination, ground water vulnerability, proximity to regulated industrial process/ landfill and flood risk from unmodelled watercourses and recommended that these be clearly identified for transparency. It is unclear whether this has been done.</p> <p>We highlight again concerns regarding the allocation of sites TB23 and SP23 in proximity to Walley's Quarry. Given the sensitivity of Walley's Quarry we question the suitability of allocating additional housing sites in proximity of the landfill.</p>
<b>Q7 Modification</b>	<p>Removal of sites TB23 and SP23 from the allocated sites list.</p> <p>Review of all other allocations to ensure site vulnerabilities are fully identified and justified.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1381
<b>Order</b>	109
<b>Title</b>	Policy SE5: Water Resources and Water Quality
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Section 3: Policy advises that residential developments should be designed to achieve a maximum of 110 litres per person per day in line with the optional standard of Building Regulations, part G. This doesn't reflect recommendations within the Water Cycle Study.</p> <p>Water Cycle Study (MEN-JBAU-XX-XX-RP-EN-0001-D1-C01-Water_Cycle_Study, issue date 22.7.2024). Section 4.7.3 highlights that Severn Trent Water supply area is defined as being under 'serious' water stress (see EA Water Stress Areas Classification: <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a>)</p> <p>Recommendations within WCS for mitigating future water stress outlined in Table 4-3 Recommendations for water resources: recommends that policy should require a water efficiency standard of 100l/p/d.</p> <p>The Government's Environmental Improvement Plan (section 3.7.2) commits to considering a new standard for new homes in England of 105lts/p/d and 100l/p/d where there is a clear local need. The WCS indicates that it is likely that this or similar standards will be adopted.</p> <p>The policy should, therefore, allow for a future reduction in the water efficiency target.</p>
<b>Q7 Modification</b>	Policy should be updated to reflect a tighter water efficiency standard as detailed within the recommendations of the WCS.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1369
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	We support the inclusion of financial contributions towards flood prevention (including upgrades to existing provision and flood alert services).
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1357
<b>Order</b>	233
<b>Title</b>	Policy TB23 Land West of Galingale View, Thistleberry
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	TB23 & SP23
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>TB23 &amp; SP23</p> <p>In our letter of 14th August 2023 in response to the Reg 18 draft local plan consultation, we highlighted that the list of proposed sites does not fully identify site vulnerabilities in terms of land contamination, ground water vulnerability, proximity to regulated industrial process/ landfill and flood risk from unmodelled watercourses and recommended that these be clearly identified for transparency. It is unclear whether this has been done.</p> <p>We highlight again concerns regarding the allocation of sites TB23 and SP23 in proximity to Walley's Quarry. Given the sensitivity of Walley's Quarry we question the suitability of allocating additional housing sites in proximity of the landfill.</p>
<b>Q7 Modification</b>	<p>Removal of sites TB23 and SP23 from the allocated sites list.</p> <p>Review of all other allocations to ensure site vulnerabilities are fully identified and justified.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1361
<b>Order</b>	105
<b>Title</b>	Policy SE3: Flood Risk Management
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE3 Flood Risk Management
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The policy should have more regard to and focus on specific local Newcastle Under Lyme flood risk requirements linked to the Strategic Flood Risk Assessment (SFRA).</p> <p>Sections 1 to 3 largely duplicate existing national policy and guidance (NPPF and NPPG) and could be more concise with relevant signposting.</p> <p>Section 3 :</p> <p>(b) is this missing the word 'requirements' ?</p> <p>(e) mentions modelling of ordinary watercourses which is welcomed. However, there may be main rivers that need modelling. Also, this section does not mention the need to model or assess functional floodplain (zone 3b) for all rivers, to inform the appropriateness of development and identify flood flow impacts/improvements.</p> <p>Section 4 Policy wording is poor and lacks clarity. What is meant by 'high risk' areas - is this focusing on flood zones e.g 'high risk' flood zone 3, or cumulative impact areas?</p> <p>(a) what are the specific minimum floor levels?</p> <p>(b) This (8 metre easement from top of bank of) is required regardless of the extent and location of the floodplain. It also relates to culverted watercourses, with the area above to be a 'no build zone' .</p> <p>(c) Should also include River Basin Management Plans.</p> <p>SFRA Cumulative Impact Assessment (pg 11) Table 2 -4: Catchments deemed highly sensitive - includes Lyme Brook, Fowlea Brook, Valley Brook and Englesea Brook as high risk cumulative impact catchments.</p> <p>The SFRA suggests that Local planning policies can also be used to identify areas where the potential for development to increase flood risk is highest and identify opportunities for such new development to positively contribute to decreases in flood risk downstream. To be more effective and link up with the SFRA, the policy should have specific regard to these.</p> <p>The policy should also require flood risk reduction and promote natural flood risk management.</p>
<b>Q7 Modification</b>	<p>The following lines could be incorporated:</p> <p>The FRA shall use modelled flood level data where possible and shall take into account appropriate allowances for climate change, using the latest Environment Agency's WMD Area Climate Change Guide.</p> <p>The flood zone 3b functional floodplain extent should be modelled as part of any detailed FRA.</p> <p>The policy should require flood risk reduction and promote natural flood risk management.</p>

	<p>The high risk catchments could be referred to in the policy or text (Catchments deemed highly sensitive) and explain what your intention is for development in these areas.</p> <p>You may wish to seek a FRA for proposals on land in those catchments identified in the SFRA as being at highest risk from the cumulative impacts of development.</p> <p>In those catchments where the cumulative effect of development is likely to have the greatest impact on flood risk, (as set out in the SFRA) other LPA's have included opportunities which should be maximised, such as:</p> <ul style="list-style-type: none"> <li>a. Natural flood management (in rural areas);</li> <li>b. SuDS retrofit (in urban areas);</li> <li>c. River restoration;</li> <li>d. Wider community flood risk benefits;</li> <li>e. Developer contributions to community flood defences outside the site boundary;</li> <li>f. On- and off-site flood storage and safeguarding of land for such.</li> </ul> <p>You should refer to Appendix F of the SFRA (this is missing from the final SFRA submission document). Your LLFA and/or Floods section may be able to further advise on this recommendation.</p> <p>Supporting text should also reference/ signpost to the appropriate River Basin Management Plans. e.g The Humber RBMP and North West RBMP.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1386
<b>Order</b>	109
<b>Title</b>	Policy SE5: Water Resources and Water Quality
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE5 Water Resources & Quality
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We welcome the inclusion of policy SE5 Water resources and water quality, noting that this picks up some of our early points regarding water framework directive; watercourse improvements; water reuse strategies etc.</p> <p>However this policy should go further and include a section on non-mains foul drainage, requiring the drainage hierarchy to be followed and appropriate assessment of water quality impacts.</p> <p>The supporting text lacks appropriate signposting to relevant catchment data (WFD), which should be included to improve the effectiveness of the policy.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1366
<b>Order</b>	103
<b>Title</b>	Policy SE2: Land Contamination
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE2
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	We welcome the inclusion of Policy SE2 focusing spcifically on Land Contamination and the requirement for appropriate risk assessment, remediation, and long term monitoring supported by financial provisions to ensure this takes place.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1392
<b>Order</b>	110
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Environment Agency
<b>Consultee Family Name</b>	Millband
<b>Consultee Given Name</b>	Emma
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	WSC evidence base
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	<p>Final Draft Local Plan Representation</p> <p>Environment Agency response dated 2/10/24. –<b>Water Cycle Study Evidence Base – waste water and quality.</b></p> <p>We previously sought the submission of a Water Cycle Study (WCS) update to address some wastewater infrastructure issues.</p> <p>For completeness, our Regulation 18 response (14 August 2023) included:</p> <p><b>Waste water infrastructure:</b> “Your water cycle study should ensure that your strategic growth can be accommodated in consideration of waste water infrastructure. Information on local treatment works and their ability to accommodate housing and employment growth is set out in the WCS. This looks at physical capacity issues (e.g. network pipes) and environmental capacity (water quality of treated effluent) issues. Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company and we have developed some general questions to assist this process (below). The outcome of this may inform a ‘phasing’ policy within your plan where appropriate. It may also be necessary to produce an ‘Infrastructure Delivery Plan’ to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is ‘sound’. Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to “ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making”. Plans should be “deliverable”. The WCS highlights that as a result of planned growth increased discharges at the wastewater treatment works may lead to a deterioration in water quality in the receiving waterbodies. As such, the WCS recommends a water quality impact assessment is undertaken through a Phase 2 Water Cycle Study. This does not yet appear to form part of the evidence base to support the local plan. To ensure a sound plan this should be provided to inform appropriateness and deliverability of sites”.</p> <p><b>Latest Water Cycle Study</b></p> <p>We note the submission of the updated WCS (July 2024), JBA, reference MEN-JBAU-XX-XX-RP-EN-0001 Revision D1.C01.</p> <p>With regard to wastewater treatment and water quality we are not in a position to make a detailed assessment at this time. However, we have done a high-level review of the report and make the following comments.</p> <p>The JBA headroom assessment identified Waste Water Treatment Works (WwTW) which have limited treatment capacity during the plan period. It suggests Severn Trent Water and United Utilities highlighted upgrades to these works are planned in the short term to increase capacity. As such, treatment capacity should not be a constraint to growth in the borough.</p> <p>The report details the STW plan, highlighting that WwTW improvement works are planned in AMP8 (2025 to 2030) for Baldwin's Gate WwTW. Improvement Works are a long-term priority for Strongford and Ashley, spanning from 2020 to 2050. Loggerheads Sanatorium was identified for WwTW Improvement Works as a focus between 2030 and 2050.</p> <p><b>We support JBA recommendations in section 8.7 (page 81) and would advise that you consult with Severn Trent Water and United Utilities who are the operators of the WwTWs serving growth across the borough; to ensure that provision of WwTW capacity is aligned with delivery of development. This will inform your plan phasing and infrastructure plan delivery.</b></p> <p>We acknowledge the Water Quality assessment within the WCS.</p> <p>This considers the increase in the discharge of effluent from WwTW as a result of development and growth in the area. Under the Water Framework Directive (WFD), a watercourse is not allowed to deteriorate from its current WFD classification (either as an overall watercourse or for individual elements assessed).</p> <p>As the WCS confirms, a new/variation to the Environmental Permit (EP) may be required (from the Environment Agency) for the WwTW to improve the quality of the final effluent, so that the increased pollution load will not result in a deterioration in the water quality of the watercourse. This is known as "no deterioration" or "load standstill". The need to meet river quality targets is also taken into consideration when setting or varying a permit.</p> <p>The WCS has considered this in section 9.2 onwards.</p> <p>We have not reviewed the modelling but note that there were ‘no significant deteriorations’ found in the WFD assessment which JBA suggest can't be prevented by improved treatment standards. There are no red GES assessment outcomes, which indicates growth alone would not prevent achievement of good ecological status in future across the borough.</p> <p>Baldwins Gate is identified as an ‘amber site’ where the WCS suggests - Proposed development can be accommodated with a tighter permit and upgrade to treatment. This is achievable with current technology.</p> <p>We support the recommendation in section 9.8 – “You should liaise with STW to determine whether Baldwins Gate WwTW upgrades planned in AMP8 (2025 to 2030) will prevent &gt;10% deterioration of river Ammonia concentration”. As your WCS suggests – “The timing of occupation of potential allocation ‘Land at Baldwins Gate Farm, Site B (LW74)’ is significant here, as it has a relatively high number of dwellings proposed (200). As such, it is likely the cause of deterioration”.</p>



You could include this in the reasoned justification for that allocation and/or your Infrastructure Plan.

Other adopted plans have included text such as – ‘Proposals within areas of infrastructure capacity constraint, as identified by the Water Cycle Study (and any major development) demonstrates that there is adequate water infrastructure in place to serve the development’.

<b>Comment ID</b>	NULLP608
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Millington
<b>Consultee Given Name</b>	Tim
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Legally compliant</b>	No
<b>Q6 Details</b>	<p>1 The plan proposes to build on green belt land the former Keele golf course without any exceptional circumstances that would allow that use.</p> <p>2. the deed under which the land formerly Keele golf course was conveyed to the owner covenants that the conveyed land shall not be used for any other purpose than "... a golf course public open space or country park" "This would not include the use proposed in the local plan.</p>
<b>Q7 Modification</b>	remove all proposed housing on designated green belt land from the plan
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	to ensure that an argument as to why the plan is not legal can be fairly presented and heard and to be allowed to rebuttal any counter argument.

<b>Comment ID</b>	NULLP174
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Millward
<b>Consultee Given Name</b>	Kathy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	NC13
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The roads currently along Chapel Lane and Bullocks House Road have areas where there is no pavement, plus residents park on the road (there is no alternative) making it hazardous for pedestrians. The roads are narrow and already get congested, particularly around school hours. There is no scope to build any type of walkway- this hazard will increase significantly with the additiona of approx 100 homes in the area as</p> <ul style="list-style-type: none"> <li>• There are very few amenities in the area - residents will have to drive to purchase even very basic groceries.</li> <li>• There is no regular bus service</li> <li>• The area is a distance from main road links</li> <li>• There is no means of employment in the vicinity therefore residents will need to commute by car.</li> </ul> <p>100 houses are a fairly insignificant number in the borough as a whole however detrimental effects on the neighborhood will be significant. This will change the dynamic of the area- plot NC13 is the last visable green space seen from the road and will remove the semi- rural feel to the village.</p> <p>Green Belt status should not be removed, as with graded listed buildings. They are a part of our heritage and once removed can not be replaced. In addition, with Green Belt these areas are home to a plethora of wildlife, many of which (for example hedgehogs) are rapidly declining in numbers due to loss of habitat. Building on NC13 is not a last resort - see next section/</p> <p>I have found the process to object to the plan extremely difficult. I do not have access to a printer or scanner and have had to labouriously photo, snip and paste to submit this form</p>
<b>Q7 Modification</b>	<p>There are alternatives to building on our remaining green spaces, such as re-purposing buildings in town centres for example. The high street as we knew it is well in decline and residential development would enhance these areas, increase footfall and benefit remaining businesses. This type of dwelling would also be more driven towards affordable housing.</p> <p>There are approximately 1000 empty dwellings in the borough which would be renovated thus improving local areas.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I WOULD LIKE TO EMPHASIS THE STRONG FEELINGS IN MY NEIGHBOURHOOD

<b>Comment ID</b>	NULLP1462
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Millward
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p> <p>Additional Comments:</p> <p>Due to historical mining in this area, I am very concerned that building on CT1 will make the land more unstable. As pointed out, many sink holes have appeared and my property, on the row of terraces already tie bars due to land movement. Would the developer be responsible should more movement occur and further damage these properties.</p> <p>This plan is not thought through and the council have not been honest and open with locals about it. Notices were not put up where there is footfall but hidden in quiet spots. Locals love this area for the greenery &amp; wish it to stay as it is. Our local doctors is already very difficult to get an appointment due to being so bust. These plans do not help this situation &amp; make it significantly more difficult. The wellbeing of people is important and the mental health at risk. Many people - most people live in Red Street for the green outlook, for peace &amp; tranquility which you are trying to destroy. I seek removal of CT1 from your plans</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1398
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Millward
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1154
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Montague
<b>Consultee Given Name</b>	Marjorie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I wish to lodge the objections listed below. They are relative to the Newcastle Under Lyme Local Plan with particular reference to the site allocations in Audley Parish. I feel that the local plan in these areas is not justifiable and is not sound.</p> <p><b><u>Site AB 2 – Land at junction 16 of the M6, Proposed strategic employment site.</u></b></p> <p>This site is proposed at 80HA – the local plan says the council are looking to allocate 22HA so why is this quadruple the size needed and all in one area and all on high quality green belt land. To allocate something that is four times what is needed, makes this element not justifiable.</p> <p>There will be a lot of work required around a new junction should this site be granted, where is the funding to come from for this? I cannot see any reference to the funding for this so feel this in itself is unsound.</p> <p>I expect there will be an increase in volume of traffic in the local area should this site be allowed, increasing air and noise pollution is not in the best interests of people living in the area and causing greater traffic volume on already busy local roads. I cannot see any justification for this development at all given that there is much warehousing lying empty in other parts of the county.</p> <p>The council appear to be adopting a high growth strategy and I would like to know where the evidence for this strategy is? I think this approach without evidence makes the plan unsound.</p> <p>I strongly believe that this site needs to be removed from the local plan as it is not a justifiable development and goes against what the council themselves say is needed for employment in the local area.</p> <p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I believe all these sites should be removed from the local plan as they are unjustifiable and unsound for the following reasons.</p> <p>AB12 – Access and egress on narrow roads that are already congested and not sustainable over time</p> <p>AB12 Areas prone to flooding and not sustaining climate control</p> <p>All areas on high quality green belt land</p> <p>Audley and Bignall End are small rural villages – losing the identity of both areas is unsound</p> <p>Additional 200 to 400 cars on the roads that are already congested, where parking problems are a major concern</p> <p>The pressure on local services that cannot manage now, I cannot get an appointment to see my GP due to demand and yet nothing presented on how this will be addressed</p> <p>Small local school, over capacity would then lead to more people travelling out of the area for school and creating further congestion</p> <p>All the suggested allocations for the area are on the green belt and would change the landscape of the local area for ever. More sustainable sites should be found and all the above should be removed from the local plan as unjustifiable and unsound.</p>
<b>Comment ID</b>	NULLP1153
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Montague
<b>Consultee Given Name</b>	Marjorie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I wish to lodge the objections listed below. They are relative to the Newcastle Under Lyme Local Plan with particular reference to the site allocations in Audley Parish. I feel that the local plan in these areas is not justifiable and is not sound.</p> <p><b><u>Site AB 2 – Land at junction 16 of the M6, Proposed strategic employment site.</u></b></p> <p>This site is proposed at 80HA – the local plan says the council are looking to allocate 22HA so why is this quadruple the size needed and all in one area and all on high quality green belt land. To allocate something that is four times what is needed, makes this element not justifiable.</p> <p>There will be a lot of work required around a new junction should this site be granted, where is the funding to come from for this? I cannot see any reference to the funding for this so feel this in itself is unsound.</p>

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<b>Comment ID</b>	NULLP1151
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Montague
<b>Consultee Given Name</b>	Marjorie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I wish to lodge the objections listed below. They are relative to the Newcastle Under Lyme Local Plan with particular reference to the site allocations in Audley Parish. I feel that the local plan in these areas is not justifiable and is not sound.</p> <p><b><u>Site AB 2 – Land at junction 16 of the M6, Proposed strategic employment site.</u></b></p> <p>This site is proposed at 80HA – the local plan says the council are looking to allocate 22HA so why is this quadruple the size needed and all in one area and all on high quality green belt land. To allocate something that is four times what is needed, makes this element not justifiable.</p> <p>There will be a lot of work required around a new junction should this site be granted, where is the funding to come from for this? I cannot see any reference to the funding for this so feel this in itself is unsound.</p> <p>I expect there will be an increase in volume of traffic in the local area should this site be allowed, increasing air and noise pollution is not in the best interests of people living in the area and causing greater traffic volume on already busy local roads. I cannot see any justification for this development at all given that there is much warehousing lying empty in other parts of the county.</p> <p>The council appear to be adopting a high growth strategy and I would like to know where the evidence for this strategy is? I think this approach without evidence makes the plan unsound.</p> <p>I strongly believe that this site needs to be removed from the local plan as it is not a justifiable development and goes against what the council themselves say is needed for employment in the local area.</p> <p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I believe all these sites should be removed from the local plan as they are unjustifiable and unsound for the following reasons.</p> <p>AB12 – Access and egress on narrow roads that are already congested and not sustainable over time</p> <p>AB12 Areas prone to flooding and not sustaining climate control</p> <p>All areas on high quality green belt land</p> <p>Audley and Bignall End are small rural villages – losing the identity of both areas is unsound</p> <p>Additional 200 to 400 cars on the roads that are already congested, where parking problems are a major concern</p>

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<b>Comment ID</b>	NULLP1155
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Montague
<b>Consultee Given Name</b>	Marjorie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I wish to lodge the objections listed below. They are relative to the Newcastle Under Lyme Local Plan with particular reference to the site allocations in Audley Parish. I feel that the local plan in these areas is not justifiable and is not sound.</p> <p><b><u>Site AB 2 – Land at junction 16 of the M6, Proposed strategic employment site.</u></b></p> <p>This site is proposed at 80HA – the local plan says the council are looking to allocate 22HA so why is this quadruple the size needed and all in one area and all on high quality green belt land. To allocate something that is four times what is needed, makes this element not justifiable.</p> <p>There will be a lot of work required around a new junction should this site be granted, where is the funding to come from for this? I cannot see any reference to the funding for this so feel this in itself is unsound.</p> <p>I expect there will be an increase in volume of traffic in the local area should this site be allowed, increasing air and noise pollution is not in the best interests of people living in the area and causing greater traffic volume on already busy local roads. I cannot see any justification for this development at all given that there is much warehousing lying empty in other parts of the county.</p> <p>The council appear to be adopting a high growth strategy and I would like to know where the evidence for this strategy is? I think this approach without evidence makes the plan unsound.</p> <p>I strongly believe that this site needs to be removed from the local plan as it is not a justifiable development and goes against what the council themselves say is needed for employment in the local area.</p> <p><b><u>Site AB12 – Land east of Diglake Street</u></b></p> <p><b><u>Site AB15 – Land north of Vernon Avenue</u></b></p> <p><b><u>Site AB 33 land off Nantwich Road/Park Lane, Audley</u></b></p> <p>I believe all these sites should be removed from the local plan as they are unjustifiable and unsound for the following reasons.</p> <p>AB12 – Access and egress on narrow roads that are already congested and not sustainable over time</p> <p>AB12 Areas prone to flooding and not sustaining climate control</p> <p>All areas on high quality green belt land</p> <p>Audley and Bignall End are small rural villages – losing the identity of both areas is unsound</p> <p>Additional 200 to 400 cars on the roads that are already congested, where parking problems are a major concern</p> <p>The pressure on local services that cannot manage now, I cannot get an appointment to see my GP due to demand and yet nothing presented on how this will be addressed</p> <p>Small local school, over capacity would then lead to more people travelling out of the area for school and creating further congestion</p> <p>All the suggested allocations for the area are on the green belt and would change the landscape of the local area for ever. More sustainable sites should be found and all the above should be removed from the local plan as unjustifiable and unsound.</p>

<b>Comment ID</b>	NULLP132
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Moody
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Dear Sir/Madam</p> <p>I am writing to oppose the local plan for Audley with regard to development sites.</p> <p>Whilst some may deem it necessary to enlarge the footprint of the village I would personally disagree.</p> <p>If you lived here you would know that the proposed access routes to these areas are already overstretched with roads being too narrow and littered with parked vehicles that make it difficult and dangerous to see round to pull out of junctions.</p> <p>There is also the issue of facilities, these are already fully stretched in Audley, the doctors is full as is the dentist and schools. There is also the issue of parking in the village which at times is ridiculous. Many times I have tried to park and been unable to as everywhere was full so I've had to go elsewhere to shop.</p> <p>Also if there are problems on the motorway or A500 the village becomes a rat run for people trying to avoid hold ups so the added lorries and cars using the proposed development sites would only make it more difficult for the residents.</p> <p>Audley is full and doesn't have the infrastructure to support these planned developments we don't have enough facilities as it is so by building more houses people would just go further afield and the village would die anyway.</p> <p>Yours faithfully Amanda Moody</p>
<b>Comment ID</b>	NULLP133
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Moody
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Dear Sir/Madam</p> <p>I am writing to oppose the local plan for Audley with regard to development sites.</p> <p>Whilst some may deem it necessary to enlarge the footprint of the village I would personally disagree.</p> <p>If you lived here you would know that the proposed access routes to these areas are already overstretched with roads being too narrow and littered with parked vehicles that make it difficult and dangerous to see round to pull out of junctions.</p> <p>There is also the issue of facilities, these are already fully stretched in Audley, the doctors is full as is the dentist and schools. There is also the issue of parking in the village which at times is ridiculous. Many times I have tried to park and been unable to as everywhere was full so I've had to go elsewhere to shop.</p> <p>Also if there are problems on the motorway or A500 the village becomes a rat run for people trying to avoid hold ups so the added lorries and cars using the proposed development sites would only make it more difficult for the residents.</p> <p>Audley is full and doesn't have the infrastructure to support these planned developments we don't have enough facilities as it is so by building more houses people would just go further afield and the village would die anyway.</p> <p>Yours faithfully Amanda Moody</p>
<b>Comment ID</b>	NULLP134
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Moody
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Dear Sir/Madam</p> <p>I am writing to oppose the local plan for Audley with regard to development sites.</p> <p>Whilst some may deem it necessary to enlarge the footprint of the village I would personally disagree.</p> <p>If you lived here you would know that the proposed access routes to these areas are already overstretched</p>

	<p>with roads being too narrow and littered with parked vehicles that make it difficult and dangerous to see round to pull out of junctions.</p> <p>There is also the issue of facilities, these are already fully stretched in Audley, the doctors is full as is the dentist and schools. There is also the issue of parking in the village which at times is ridiculous. Many times I have tried to park and been unable to as everywhere was full so I've had to go elsewhere to shop. Also if there are problems on the motorway or A500 the village becomes a rat run for people trying to avoid hold ups so the added lorries and cars using the proposed development sites would only make it more difficult for the residents.</p> <p>Audley is full and doesn't have the infrastructure to support these planned developments we don't have enough facilities as it is so by building more houses people would just go further afield and the village would die anyway.</p> <p>Yours faithfully Amanda Moody</p>
<b>Comment ID</b>	NULLP135
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Moody
<b>Consultee Given Name</b>	Amanda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
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<b>Comment ID</b>	NULLP1435
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Moore
<b>Consultee Given Name</b>	Jeremy
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>



	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>It is known that there are a large amount of mine workings in this area of proposed development. Investigation by the landowner has shown that development is not financially viable.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1434
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Moore
<b>Consultee Given Name</b>	Jeremy
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1447
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Moore
<b>Consultee Given Name</b>	Sharon
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1448
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Moore
<b>Consultee Given Name</b>	Sharon
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1254
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Jan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I do not understand why AB12 was not included in the ED008 Green Belt Review Report Part 4 presented by ARUP, however, I do wish to object to AB12 being included in the Final Local Plan for the following reasons:-</p> <p>This site is part of the green belt and belongs to Staffordshire County Council and has been rented out to farmers for many, many years and is still being farmed to this day.</p> <p>In NULBC evidence Site Selection Report ED029 this site is described as “strong” for the green belt yet it has been chosen over and above sites which are “moderate” or “weak” – why might this be?</p> <p>It saddens to me to say this but this is just seen as asset stripping by the Borough Council and should not be allowed. Audley has a high water table and this site is prone to flooding and not just in the winter months and if this site is developed, this will increase the risk of flooding on the roads and the nearby stream of Brierley Brook which will then flood adjoining farmland and prevent it from being farmed appropriately. I know of properties in the area that already flood – building 125 houses will just increase these incidents. The main access point to AB12 is going to be at the bottom of Diglake Street and it is proposed to provide off street parking for the current residents on the new site. There are about approximately 110 homes without car parking in Diglake Street, Edward Street and Albert Street – the majority of which have cars which they park outside their homes, part way on the pavements so that a single car can drive down the middle.</p> <p>The above photo (see attachment) shows Diglake Street to the right, Edward Street across the top and Albert Street down the left hand side. How can all the residents of these houses be expected to park in this car park when many are elderly or are young families with pushchairs etc and some of them are disabled.</p> <p>How is it realistic or appropriate to expect people to park their second most expensive possession away from the security of their homes and out of sight and then have to carry heavy shopping etc to their homes, unload pushchairs and sort out children. Just not practical. 125 dwellings will probably result in at least 125 additional cars using Diglake Street etc and the junction where Diglake Street &amp; Albert Street meet Ravens Lane and is a difficult junction to navigate, particularly at peak school times with a primary school and nursery in the locality and children being escorted on foot but being dropped off by car, making it even more dangerous. AB12 is This site is unrealistic/not justified and therefore unsound</p>
<b>Q7 Modification</b>	<p>The Final Local Plan is based on a High Growth Scenario yet there is no justification of why this might be.</p> <p>The last census showed a reduction in population, our birth rate is lower than our death rate, our unemployment is low – Newcastle under Lyme does not follow the rest of the UK so I feel we do have exceptional circumstances to justify a reduction in NULBC housing targets but they have not listened. Can you also refer to Pages 4 &amp; 9 of Appendix B which was my response to Regulation 18 for more figures to back this point up. I honestly believe this Local Plan is not sound – the housing figures are still too high. The previous consultation (Regulation 18) didn't follow the Gunning Principles – see Audley Rural Parish response and this consultation has had various set-backs including miscommunication with the public – we were initially informed that email submissions would not be allowed but then after several weeks, we were informed that emails were allowed. See official notice from NULBC below.</p> <p>The Portal for both consultations has caused much frustration amongst residents. There were complaints about the Portal during Regulation 18 yet the same problems of not being able to access it, not being able to add comments continues. NULBC did not listen to residents and improve the Portal At the Audley consultation event for Regulation 18, Cllr McEmeny was heard to say that this AB2 WILL be going ahead – this is gross predetermination. For Regulation 19 several evidential reports were not made available in time for either the Special meeting of the Economy &amp; Place Scrutiny Committee on 11th July 2024 nor the Full Council Meeting on 24th July 2024 – certain councillors actually lied at the Full Council and said that they were available – they were not! We have the proof that they weren't – see below</p> <p>How do councillors make crucial decisions as to whether the draft Local Plan should be progressed without having the opportunity to view and digest information? In any event, in order to make this Final Local Plan sound you need to remove the following sites from this the Final Local Plan AB2/AB2a AB12, AB15 &amp; AB33</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Although I do not wish to speak at the public hearing – I would like to be in the public gallery if at all possible. I am unsure whether this will be possible.
<b>Attachments</b>	<a href="#">1298732 J Moreau Appendix B.pdf</a> <a href="#">1298732 J Moreau.pdf</a> <a href="#">1298732 J Moreau Appendix A.pdf</a>
<b>Comment ID</b>	NULLP1256



<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Jan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB33 is high quality agricultural land in the green belt. It is owned by Staffordshire County Council and has been used as a starter farm for those wishing to get into farming for many, many years. As per NULBC evidence document ED29 Site selection – this site is “strong” with regard to the Green Belt, so how is that his site has been chosen bearing in mind that there are other sites in the Parish which are either “weak” or “moderate”. Why have two “strong” sites belonging to Staffordshire County Council been chosen? Again, I believe this is just asset stripping by the Borough Council – in fact a recent commission by Staffordshire County Council suggested that 1000 houses could be built in Audley so they are definitely intent on selling off all their publicly owned land. See Staffs CC Land at Audley Greenbelt Assessment &amp; Parcel Option prepared by David Locke Associates 04/23. In recent years, Staffordshire County Council have not re-let the farmstead itself even though they have had enquiries but the fields are still in use for grazing cattle even though the Local Plan says otherwise. The site is subject to flooding due to the high water table in the area and has in fact had a pond for the majority of 2024 (see attachment)</p>
<b>Q7 Modification</b>	<p>The Final Local Plan is based on a High Growth Scenario yet there is no justification of why this might be.</p> <p>The last census showed a reduction in population, our birth rate is lower than our death rate, our unemployment is low – Newcastle under Lyme does not follow the rest of the UK so I feel we do have exceptional circumstances to justify a reduction in NULBC housing targets but they have not listened. Can you also refer to Pages 4 &amp; 9 of Appendix B which was my response to Regulation 18 for more figures to back this point up. I honestly believe this Local Plan is not sound – the housing figures are still too high. The previous consultation (Regulation 18) didn't follow the Gunning Principles – see Audley Rural Parish response and this consultation has had various set-backs including miscommunication with the public – we were initially informed that email submissions would not be allowed but then after several weeks, we were informed that emails were allowed. See official notice from NULBC below.</p> <p>The Portal for both consultations has caused much frustration amongst residents. There were complaints about the Portal during Regulation 18 yet the same problems of not being able to access it, not being able to add comments continues. NULBC did not listen to residents and improve the Portal At the Audley consultation event for Regulation 18, Cllr McEmeny was heard to say that this AB2 WILL be going ahead – this is gross predetermination. For Regulation 19 several evidential reports were not made available in time for either the Special meeting of the Economy &amp; Place Scrutiny Committee on 11th July 2024 nor the Full Council Meeting on 24th July 2024 – certain councillors actually lied at the Full Council and said that they were available – they were not! We have the proof that they weren't – see below</p> <p>How do councillors make crucial decisions as to whether the draft Local Plan should be progressed without having the opportunity to view and digest information? In any event, in order to make this Final Local Plan sound you need to remove the following sites from this the Final Local Plan AB2/AB2a AB12, AB15 &amp; AB33</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Although I do not wish to speak at the public hearing – I would like to be in the public gallery if at all possible. I am unsure whether this will be possible.
<b>Attachments</b>	<a href="#">1298732 J Moreau.pdf</a> <a href="#">1298732 J Moreau Appendix B.pdf</a> <a href="#">1298732 J Moreau Appendix A.pdf</a>
<b>Comment ID</b>	NULLP1251
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Jan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I wish to register my objection to this site being included in NULBC Final Draft Local Plan for the following reasons:-</p> <p>The proposed site is 80 hectares of good quality, agricultural land in the green belt and NULBC are proposing to take the whole site out of the green belt although they only have a need for just 22 hectares of employment land. This in itself makes this unjustified and therefore unsound.</p> <p>The site is said to be only accessible by the A500, although there are two emergency exits proposed, one off Park Lane and the other off Barthomley Road. The country lanes adjoining this site are single track, high hedged, winding lanes which are utilised for recreational use and connect to the various</p>

PROWs in the area – they are used by walkers, cyclists, dog walkers, the local walking club and the local running club and horse riders. There are businesses in the area that also utilise these lanes – a dog kennels and several livery yards. See Photos showing our country lanes (see attachment)

This site is enormous – nearby villages of Audley and Bignall End would fit into the footprint. St Modwen, the developer in their Regulation 18 response stated that there would be several warehouses, ranging from 300K sq ft to one of 1 M sq ft with heights up to 24 m (approx. 79 ft) just at the eaves 24 m this is higher than many of our native trees - Ash takes 20 yrs to reach 18 metres, an Oak takes 20 yrs to reach 18 m and an Ash 25 yrs to reach 12 m. It would be an eyesore from many miles around and please bear in mind that many of the Audley Parish villages are actually on higher ground and actually look down upon the proposed site.

#### The Green belt

“NPPF Paragraph 142. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. This ensures that while limited development is allowed, the strategic function of Green Belts as a buffer against urban sprawl and a space for recreation and environmental preservation is maintained.” There have been several reports written determining whether AB2 is strong, moderate or weak for green belt principles and I believe it to be “strong”. The recent ARUP Green Belt Site report (16th July 2024) recommended the site be excluded because “Development would however represent a significant encroachment into the countryside and therefore removal of the site from the Green Belt could harm the overall function and integrity of the Green Belt” (pages 28 F2 and F4)” In a previous report commissioned by Staffordshire County Council the site was found to have made a strong contribution to the greenbelt, yet NULBC have not taken this into consideration and not included it in their evidence. Why might this be? Predetermination?

#### Warehousing

There is no evidence that we require more warehousing in the area. I support Audley Community Action Group who are challenging the inclusion of this site and a recent quick survey showed the following table of warehouses on the market for lease in the surrounding area.

This doesn't take into account those that are being built just down the road at Chatterley Valley off Peacocks Hay Road/the A34 and other warehousing sites in the planning process in nearby Crewe (as detailed in Audley Community Action Group in their response).

Why was AB2 chosen over other contender sites in the Borough which are more sustainable already having access to the road system and are in industrial areas rather than open country side? Why was TK30 not chosen or the two sites at High Carr BW2 AND BW3 which are in an industrialised area already and are in close proximity to the Chatterley Valley site and have easy access to the A34.

#### Increase in traffic

St Modwen say that the site will employ around 3000 people and there will be a high quality resting area with amenities for 100 HGVs and then there will be all the delivery

& service vehicles to the site on a 24/7 basis all year round. An enormous increase in traffic on our local roads.

Junction 16 is already a hot spot for accidents and there is traffic congestion from both directions on the A500 on a daily basis, not only at peak periods. These queues regularly back up way passed the Alsager Road bridge which is over 1.5 miles away from J16 itself. See attached Photo of this regular occurrence and info relating to an accident which happened just last night 4th October 2024

Audley Community Action Group carried out a traffic survey on the B5500 on a few days wc 20th September 2024 and the traffic counted going through the mini roundabout on Nantwich Road/Alsager Road was between 1350-1750 vehicles over a 2

hr period on three days – these were normal days with no reported accidents. Anyhow, going back to AB2 The majority of this site's potential employees will travel by car to reach the site vastly increasing the amount of traffic not only on the A500 and M6 motorway but through our villages – using it as a “rat run” to save queuing on the A500 – they will use our narrow country roads and lanes, endangering our residents and wrecking our roads which are already full of pot holes and damaged kerbs from HGVs trying to navigate tiny roundabouts.

Who will “police” the proposed emergency exits which come out directly on to single track, winding, high hedged country lanes which are used by walkers, cyclists and horse riders on a daily basis. These lanes have no footpaths and no lighting and form part of the Two Saints Way, an ancient route from Lichfield to Chester. The lanes also form part of the PROWs that cross AB2. This site is not sustainable if people are travelling in by car or motorbike. St Modwen

say that they will fund a bus service for a number of years but is there any evidence that this is going to happen and why do St Modwen say that 10% of motorists will give up their cars to choose travelling by bus. I don't think so, would you walk to a bus station to catch a bus that will probably take you 3x as long to get to work. Audley Community Action Group has employed a traffic expert who says that a more realistic figure for travelling by bus would be 3% of the workforce so where is St Modwen's evidence. It is unrealistic, therefore, unjustified and unsound. Audley's own reduced bus service is currently heavily subsidised and I expect many bus services are also subsidised so after the honeymoon period, St Modwen & NULBC reckon that by actually charging employees to park on AB2 will subsidise the bus service but how do they work that out – if employees refuse to pay the charges and go on the bus in droves, then how will that work?

Alternatively, St Modwen suggest cycling to work and say they will improve the cycle pathways. They have not taken into consideration the topography of our area – will cyclists really want to negotiate the likes of Bignall Hill on B5500 and Alsagers Bank after a 12 hr. warehouse shift nor have they considered the reality of improving the B5500 for cyclists. The road is hardly wide enough for footpaths in some lengths, let

alone have room for cycle ways. Then we come to the matter of increased traffic and increased pollution be it CO2 emissions or tyre particulates - tyres produce 36 milligrams of particles each kilometre, 1,850 times higher than the 0.02 mg/km average from exhausts

	<p><a href="https://www.theguardian.com/environment/2022/jun/03/car-tyres-produce-moreparticle-pollution-than-exhausts-tests-show">https://www.theguardian.com/environment/2022/jun/03/car-tyres-produce-moreparticle-pollution-than-exhausts-tests-show</a></p> <p>Are you aware that Audley has a high respiratory rate – in 2023, we were 10th in the UK – this year we are 6th highest. See Dr Richard Page, Audley GP responses from the last consultation, Regulation 18 – Appendix “A” attached. Dr Page will also be providing his own response to this consultation. What affect will this have on the residents of Audley Parish – if this site goes ahead, it will remove the carbon catching green fields which probably protect us to some degree from pollution emanating from the adjoining M6 and A500 and replace it with increased pollutants for us all to breathe in. Funding for the alterations to Junction 16 St Modwen’s previous response for Regulation 18 was based on the assumption that HS2 would go ahead and money would be made available from the Government for the necessary alterations to Junction 16. HS2 is now defunct and these funds have been allocated elsewhere so where is the funding coming from for this – without funding this is another reason why this site is unrealistic, unjustified and therefore not sound.</p>
<b>Q7 Modification</b>	<p>The Final Local Plan is based on a High Growth Scenario yet there is no justification of why this might be.</p> <p>The last census showed a reduction in population, our birth rate is lower than our death rate, our unemployment is low – Newcastle under Lyme does not follow the rest of the UK so I feel we do have exceptional circumstances to justify a reduction in NULBC housing targets but they have not listened. Can you also refer to Pages 4 &amp; 9 of Appendix B which was my response to Regulation 18 for more figures to back this point up.</p> <p>I honestly believe this Local Plan is not sound – the housing figures are still too high. The previous consultation (Regulation 18) didn’t follow the Gunning Principles – see Audley Rural Parish response and this consultation has had various set-backs including mis communication with the public – we were initially informed that email submissions would not be allowed but then after several weeks, we were informed that emails were allowed. See official notice from NULBC below</p> <p>The Portal for both consultations has caused much frustration amongst residents. There were complaints about the Portal during Regulation 18 yet the same problems of not being able to access it, not being able to add comments continues. NULBC did not listen to residents and improve the Portal At the Audley consultation event for Regulation 18, Cllr McEmeny was heard to say that this AB2 WILL be going ahead – this is gross predetermination. For Regulation 19 several evidential reports were not made available in time for either the Special meeting of the Economy &amp; Place Scrutiny Committee on 11th July 2024 nor the Full Council Meeting on 24th July 2024 – certain councillors actually lied at the Full Council and said that they were available – they were not! We have the proof that they weren’t – see below</p> <p>How do councillors make crucial decisions as to whether the draft Local Plan should be progressed without having the opportunity to view and digest information? In any event, in order to make this Final Local Plan sound you need to remove the following sites from this the Final Local Plan AB2/AB2a AB12, AB15 &amp; AB33</p>
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<b>Q9 Hearing reasons</b>	Although I do not wish to speak at the public hearing – I would like to be in the public gallery if at all possible. I am unsure whether this will be possible.
<b>Attachments</b>	<p><a href="#">1298732 J Moreau.pdf</a></p> <p><a href="#">1298732 J Moreau Appendix B.pdf</a></p> <p><a href="#">1298732 J Moreau Appendix A.pdf</a></p>
<b>Comment ID</b>	NULLP1255
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Jan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Again, this site AB15 is good quality agricultural land in the green belt and has been grazed for a number of years and is still in use, contrary to what the Local Plan has to say. There is photographic evidence to prove this which will be submitted if required. There is a high water table in Audley and it doesn’t take much precipitation before the field floods and the roads cascade with water. The sewers are from the Victorian era and just can’t cope. Building 15 homes on this plot of land will just exacerbate the problem.
<b>Q7 Modification</b>	<p>The Final Local Plan is based on a High Growth Scenario yet there is no justification of why this might be.</p> <p>The last census showed a reduction in population, our birth rate is lower than our death rate, our unemployment is low – Newcastle under Lyme does not follow the rest of the UK so I feel we do have exceptional circumstances to justify a reduction in NULBC housing targets but they have not listened. Can you also refer to Pages 4 &amp; 9 of Appendix B which was my response to Regulation 18 for more figures to back this point up. I honestly believe this Local Plan is not sound – the housing figures are still too high. The previous consultation (Regulation 18) didn’t follow the Gunning Principles – see Audley Rural Parish response and this consultation has had various set-backs including mis communication with the public – we were initially informed that email submissions would not be allowed but then after several weeks, we were informed that emails were allowed. See official notice from NULBC below.</p>

	<p>The Portal for both consultations has caused much frustration amongst residents. There were complaints about the Portal during Regulation 18 yet the same problems of not being able to access it, not being able to add comments continues. NULBC did not listen to residents and improve the Portal At the Audley consultation event for Regulation 18, Cllr McEmeny was heard to say that this AB2 WILL be going ahead – this is gross predetermination. For Regulation 19 several evidential reports were not made available in time for either the Special meeting of the Economy &amp; Place Scrutiny Committee on 11th July 2024 nor the Full Council Meeting on 24th July 2024 – certain councillors actually lied at the Full Council and said that they were available – they were not! We have the proof that they weren't – see below</p> <p>How do councillors make crucial decisions as to whether the draft Local Plan should be progressed without having the opportunity to view and digest information? In any event, in order to make this Final Local Plan sound you need to remove the following sites from this the Final Local Plan AB2/AB2a AB12, AB15 &amp; AB33</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Although I do not wish to speak at the public hearing – I would like to be in the public gallery if at all possible. I am unsure whether this will be possible.
<b>Attachments</b>	<a href="#">1298732 J Moreau Appendix A.pdf</a> <a href="#">1298732 J Moreau.pdf</a> <a href="#">1298732 J Moreau Appendix B.pdf</a>

<b>Comment ID</b>	NULLP1233
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Phil
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	I believe you should remove AB2 from the Local Plan.
<b>Attachments</b>	<a href="#">1305543_Phil Moreau.pdf</a>
<b>Comment ID</b>	NULLP1242
<b>Order</b>	270
<b>Number</b>	Map 1
<b>Title</b>	Audley Ward Map
<b>Consultee Family Name</b>	Moreau
<b>Consultee Given Name</b>	Phil
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Please see attached
<b>Q7 Modification</b>	I believe you should remove AB2 from the Local Plan.
<b>Attachments</b>	<a href="#">1305543_Phil Moreau.pdf</a>

<b>Comment ID</b>	NULLP4
<b>Order</b>	269
<b>Title</b>	Appendix 7: Final Draft Local Plan Site Allocation Maps
<b>Consultee Company / Organisation</b>	BSL Communication Service Ltd
<b>Consultee Position</b>	Director
<b>Consultee Family Name</b>	Moss
<b>Consultee Given Name</b>	Joshua
<b>Q4 Part of document</b>	Policies Map
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I am writing to formally object to the proposed local plan to build housing and warehousing on greenbelt land within [specific area]. This objection is based on both legal guidelines and the potential harm such development will cause to the local area.</p> <p>First, it is important to highlight the legal framework governing greenbelt land. According to the National Planning Policy Framework (NPPF), greenbelt land is designated to prevent urban sprawl by keeping land permanently open and maintaining the character of the countryside. The NPPF stipulates that development on greenbelt land should only be permitted in exceptional circumstances and that any such development must demonstrate clear, substantial, and sustainable benefits to the public, which I believe this proposal does not adequately provide.</p> <p>Additionally, the local authority is required to show that all reasonable alternatives to greenbelt development have been fully explored, including the use of brownfield sites or underutilised urban land. There is a lack of evidence in the current proposal that these alternatives have been sufficiently considered, which raises concerns about the legitimacy of the decision to encroach on greenbelt land.</p> <p>Furthermore, the proposed development would have significant detrimental impacts on the local environment and community. The greenbelt in our area is not only a vital part of our local ecosystem, providing habitats for wildlife and contributing to biodiversity, but it also serves as a critical space for recreation and well-being for residents. The introduction of housing and warehousing would increase pollution, strain existing infrastructure, and degrade the quality of life for current residents. It would also contribute to the loss of open space that is increasingly important in the face of climate change, contradicting the government's commitment to environmental sustainability.</p> <p>In conclusion, I strongly urge the council to reconsider this proposal, taking into account the legal requirements for greenbelt protection and the long-term negative impacts that such development would have on the local area. Instead, I recommend exploring more sustainable development options that do not compromise our greenbelt or the integrity of our community.</p>
<b>Q7 Modification</b>	<p>I am writing to formally object to the proposed local plan to build housing and warehousing on greenbelt land within [specific area]. This objection is based on both legal guidelines and the potential harm such development will cause to the local area.</p> <p>First, it is important to highlight the legal framework governing greenbelt land. According to the National Planning Policy Framework (NPPF), greenbelt land is designated to prevent urban sprawl by keeping land permanently open and maintaining the character of the countryside. The NPPF stipulates that development on greenbelt land should only be permitted in exceptional circumstances and that any such development must demonstrate clear, substantial, and sustainable benefits to the public, which I believe this proposal does not adequately provide.</p> <p>Additionally, the local authority is required to show that all reasonable alternatives to greenbelt development have been fully explored, including the use of brownfield sites or underutilised urban land. There is a lack of evidence in the current proposal that these alternatives have been sufficiently considered, which raises concerns about the legitimacy of the decision to encroach on greenbelt land.</p> <p>Furthermore, the proposed development would have significant detrimental impacts on the local environment and community. The greenbelt in our area is not only a vital part of our local ecosystem, providing habitats for wildlife and contributing to biodiversity, but it also serves as a critical space for recreation and well-being for residents. The introduction of housing and warehousing would increase pollution, strain existing infrastructure, and degrade the quality of life for current residents. It would also contribute to the loss of open space that is increasingly important in the face of climate change, contradicting the government's commitment to environmental sustainability.</p> <p>In conclusion, I strongly urge the council to reconsider this proposal, taking into account the legal requirements for greenbelt protection and the long-term negative impacts that such development would have on the local area. Instead, I recommend exploring more sustainable development options that do not compromise our greenbelt or the integrity of our community.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6368618
<b>Attachments</b>	<a href="#">Supporting Letter 1362390 J Moss</a>



<b>Comment ID</b>	NULLP1460
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Mountford
<b>Consultee Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p> <p>Additional comments</p> <p>Without the necessary infrastructure in place this development will put severe pressures on schools, doctors surgery, roads unable to take the extra traffic. What about resources such as water, where will the additional water come from? There are no new resources in the area, so where will that come from?</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1396
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Mountford
<b>Consultee Given Name</b>	Michael

<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP87
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Mrozicki
<b>Consultee Given Name</b>	Chrissy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>To who it may concern</p> <p>I wish to advise you of my concerns regarding the local plan for Newcastle under Lyme and in particular the areas SP11 (1,2,3,4) and SP 23 1. Is it essential for this amount of residential development?</p> <ol style="list-style-type: none"> <li>1 Can the borough justify such a large development on greenbelt land?</li> <li>2 Can the borough explain the loss of the greenbelt?</li> <li>3 Has there been sufficient surveys done to justify the destruction of wildlife and their habitats?</li> <li>4 What is the impact going to be on local amenities?</li> <li>5 What is the impact going to be on the local schools?</li> <li>6 What is the impact going to be on residents?</li> <li>7 What is the impact of Walleys Quarry going to be on this development?</li> <li>8 How Will already congested roads manage?</li> <li>9 How will the increased in traffic affect the roads, the business's, and the residents?</li> <li>0 How will the overall development affect air quality?</li> </ol>
<b>Comment ID</b>	NULLP90
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Mrozicki
<b>Consultee Given Name</b>	Chrissy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Concern</p> <p>Dear sir/ madam</p> <p>General concern over the local plan</p> <p>There are a substantial amount of empty properties or part empty properties in the borough, not least in Newcastle town itself, instead of pursuing removing land from the greenbelt should the borough be looking into renovating or supporting private owners in the use of existing buildings ?</p> <p>The local statistics for population growth are very variable and the population stability is unstable some of which is due to the student population is this not a sound and justified reason not to invest in the greenbelt but to minimise spending and concentrate on existing buildings</p>
<b>Comment ID</b>	NULLP86
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Mrozicki
<b>Consultee Given Name</b>	Chrissy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site 8

<p><b>Q6 Details</b></p>	<p>Dear sir/madam</p> <p>I wish to raise concerns over the proposed site T&amp;G8 of the local plan.</p> <p>My concerns are</p> <ol style="list-style-type: none"> <li>1. The current access to the site is a public footpath and would not be suitable for daily use by vehicles to access the proposed site.</li> <li>2. As a public footpath how will pedestrians be kept safe?</li> <li>3. As the access cuts across the allotment site how will the allotment safety be maintained?</li> <li>4. There is no lighting on this access therefore especially in the winter months the proposed access will be in total darkness how will this be addressed?</li> <li>5. The site itself is a flood risk how will this be managed?</li> <li>6. The site proposed currently has waste material on it with possible contaminated materials, how will this be safely removed give the public footpath issues mentioned in earlier concerns?</li> <li>7. The roads leading to the proposed site are residential streets with a junior school on them, how will safety for residents and children be managed?</li> <li>8. The proposed site currently sits as part of a statutory registered allotment site. The only reason this site it's not in use is due to the borough council's neglect of the site following evictions 10 years ago</li> </ol>
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<b>Comment ID</b>	NULLP985
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Draft Policy MD29: Land North of Bar Hill, Madeley Draft</p> <p>Policy MD29 allocates land for residential development. This site is divorced from the wider settlement on the opposite side of the Crewe – Stafford railway line. We consider that the methodology for site selection for allocations which underpins this plan is fundamentally flawed and has resulted in less sustainable options being pursued due to lack of a Green Belt designation beyond the Crewe – Stafford railway line. This is considered to represent an inappropriate incursion into the wider open countryside when compared against our client's land interests. We consider that the plan has not proactively assessment reasonable alternatives which would significantly reduce harm to the wider landscape and open countryside overall.</p> <p>Indeed, e merging national policy proposes changes regarding Green Belt release. This sets out that when considering site's for Green Belt release, consideration should be first be given to previously developed land in sustainable locations, then consider Grey Belt land in sustainable locations. Grey Belt land is defined as land which provides a limited contribution to Green Belt purposes. The purpose of this policy shift is to allow the easier release of poor-quality Grey Belt land to meet development needs. We consider that the Site has good potential to be considered Grey Belt because it provides a limited contribution to the Green Belt purposes (as demonstrated above). The Site is also considered to comprise land which is (1) fully enclosed by built form, (2) make no contribution to preventing neighbouring towns from merging into one another (3) land which is dominated by urban land uses and (4) has no contribution to preserving the setting and special character of historic towns. As such, it is unclear why land which has good potential to be considered Grey Belt in line with emerging policy was not assessed as a reasonable alternative compared to draft allocation MD29.</p> <p>The Site is considered to lie in a sustainable location adjoining the rural centre of Madeley and Madeley Heath (joint) providing a range of essential services to meet day to day needs of residents. The Site has also been earmarked for the future delivery of a new school. As set out above, the Council's own evidence base (Rural Area Topic Paper Part 1: Hierarchy of Centres) states that the centre of the village of Madeley is within 15 minutes' walk to the centre of Madeley Heath and therefore it is important to review the sustainability of this Site in the context of the joint settlement and the Council's policy approach to settlement hierarchy. Further analysis of sustainability is detailed in the Frost Planning Regulation 18 representations where it was found that the Site is within walking distance to: Meadows Primary School (within 10 metres); Talk Talk Park (within 100m); The Old Swan public house (within 200m); a range of retail/leisure/community uses in the wider village of Madeley (ranging within 800-1500m), Madeley High School (within 1000m). Bus / cycle accessibility to: Keele University (within 3.5km); Newcastle-under-Lyme town centre (within 6km). Regular bus service (no.85) connects to Madeley village centre, Crewe town centre, Keele University, and Newcastle-under-Lyme town centre. Indeed, draft allocation MD29 and site MD12A both adjoin the same joint settlement and are therefore considered to score the same in context of sustainability of location.</p> <p>MHDL considers that the draft Policy MD29 and the Policies Map fails to meet the tests of soundness because it is not justified: the methodology for site selection has resulted in less sustainable options being presented and has not properly considered more sustainable options within the Green Belt which are considered to have less harm on the wider landscape and open countryside to meet development needs (such as Site MD12A).</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Q10 File 1</b>	6390498



<b>Attachments</b>	1364329 Imogen Zulver.pdf
<b>Comment ID</b>	NULLP983
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Draft Policy PSD5: Green Belt</p> <p>Draft Policy</p> <p>PSD5: Green Belt defines the Green Belt boundary on the Policies Map. The plan thus acknowledges that exceptional circumstances exist to release Green Belt land which is supported by MHDL. However as set out in our representations above, we consider that the plan is unsound as it does not plan for enough homes to meet its own needs nor in the context of cross boundary strategic planning with Stoke on Trent. As such as we consider that there is still a shortfall in housing land within the authority which can only be met through further release of Green Belt land to meet future development needs. MHDL therefore considers that the draft</p> <p>Policy PSD4: Green Belt and the Policies Map fails to meet the tests of soundness for the following reasons:</p> <ol style="list-style-type: none"> <li>1 It is not positively prepared – it fails to identify sufficient sources of developable residential land that are underpinned by sound evidence;</li> <li>2 It is not justified – the Council has not provided robust evidence to underpin its housing requirement and has not considered reasonable alternatives to meet housing needs on additional sites;</li> <li>3 It is not effective – the proposed Green Belt boundary will not allow the delivery of housing required as evidenced in our response to draft Policy PSD1; and,</li> <li>4 It is not consistent with national policy – it therefore fails to afford with the Framework (paragraphs 15, 20, 60 – 62 inclusive).</li> </ol>
<b>Q7 Modification</b>	<p>It is recommended that consideration should be given to our client's land interests in 'Land at Madeley Heath' (site ref. MD12A, also known as 'Land Area 2 at Marley Eternit Tiles, Madeley Heath'). Previous site specific representations prepared by Frost Planning in response to the Regulation 18 consultation sets out why this Site is considered to have excellent potential to deliver a substantial number of new homes and new school for Madeley Heath. In summary, the Site is contained within the existing built-up area both physically and visually (including planning permission Planning permission (17/00514/OUT) granted in 2018 for 35 dwellings on adjacent land to the east) and M6 corridor. It is not considered to make any significant contribution towards the five purposes of the Green Belt. Lichfields has expanded on Frost's original assessment of the Site's performance against the Green Belt purposes below:</p> <p>1</p> <p>The existing containment due to surrounding housing, industry, and the M6 motorway would prevent urban sprawl in any directions. In addition, the Council's own assessment of the Site confirms that this would not represent unrestricted sprawl of the large built-up area as it is not connected to the large built-up area of Newcastle Under Lyme.</p> <p>2</p> <p>Madeley and Madeley Heath already form a single settlement as a joint Rural Centre so the merging of neighbouring towns could not occur. The Council's assessment comments that the development of this Site would significantly reduce the gap between Madeley Heath and Madeley (although it acknowledges that the M6 retains an element of separation). We do not endorse this assessment regarding a reduction in the gap. This is because there are already residential dwellings outwith the settlement boundary to the west of the Site (washed over by Green Belt). The development of this Site will bring the built-up area no closer to Madeley than residential development which already exists.</p> <p>3</p> <p>The Site is not considered to have any physical or visual affinity to the wider open countryside due to the containment by surrounding housing, industry and the M6 motorway thus is not considered to encroach into the countryside. The Council's own assessment comments on the size of the settlement relative to the size of Madeley Heath. However, this is not considered relevant to the encroachment into the countryside and this analysis is best placed when considering the sustainability of the Site and the ability of the Site to be supported by the existing services and amenities. Indeed, the Council's own evidence base states that the centre of the village of Madeley is within 15 minutes' walk to the centre of Madeley Heath. It is therefore critical to review the sustainability of this Site in the context of the joint settlement which is explored further below (in considering sustainability). Nevertheless, we do not endorse the Council's assessment on encroachment into the Countryside as the Site is entirely contained. Madeley or Madeley Heath are not considered to be historic towns and therefore the development would not</p>

	<p>affect, or other neighbouring towns, due to the factors above. Therefore, development would not harm the historic setting of nearby settlements.</p> <p>5</p> <p>The development would indirectly assist in urban regeneration in the district, including encouraging the recycling of derelict and other urban land, by providing more housing and bolstering the Borough's economic climate (i.e. increased spend and future investment in the urban areas). Nevertheless, the Council have already acknowledged that exceptional circumstances exist to release Green Belt land and thus this Site performs no different to any other Green Belt site being considered for allocation for residential development.</p> <p>Overall, we consider that the Council's own assessment of the Site's performance against the Green Belt purposes is fundamentally flawed and do not endorse the conclusion that the Site would make a moderate contribution to Green Belt purposes / harm the overall function and integrity of the Green Belt. In addition to the assessment above, it is considered that if it is found that there is no need for a school on this Site, the layout can be easily reconfigured to bring residential development forward on the parcel of land closest to the existing village of Madeley Heath. We therefore urge that the Council reconsider the Site for allocation to meet additional needs evidenced in our response to draft Policy PSD 1.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Q10 File 1</b>	6390498
<b>Attachments</b>	<a href="#">1364329 Imogen Zulver.pdf</a>
<b>Comment ID</b>	NULLP979
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Draft Policy PSD 1: Overall Development Strategy</b></p> <p>Draft Policy PSD 1 sets a minimum housing requirement of 8,000 homes across the plan-period between 2020 to 2040: equating to an average delivery of 400 dwellings per annum [dpa]. This is above the figure derived from the standard method for assessing local housing need as detailed in the latest Housing and Economic Development Needs Assessment (2024) [HENA] prepared by Turley. This also presents an uplift compared to the Regulation 18 version of the plan which we understand is to take account of forecast job growth.</p> <p>In accordance with paragraph 61 of the National Planning Policy Framework [the Framework] (2023), MHDL supports the delivery of housing above the standard method figure. However, we note that the Government has recently published an update to the standard method which moves away from a demographic-based approach using the 2014-based Sub-National Household Projections, and instead aligns with the current stock of housing in a particular area, with a further uplift to address affordability issues. The resultant figure (subject to consultation) for NuL is now 593 dpa, an increase of 193 dpa, or 48%, over and above the 400 dpa target in Policy PSD1.</p> <p>Whilst it is marginally within the 200 dpa differential threshold set out in the draft Framework (July 2024) that would automatically require NuL Borough Council to revisit its housing requirement, it is nevertheless indicative of a radical change in housing policy from the new Labour Government.</p> <p>Nevertheless, in light of this new evidence and to address the true level of need, we disagree with the scale of the uplift and consider that Newcastle-under-Lyme Borough should plan for a higher housing requirement for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Affordable housing need:</b> The PPG states that Local Planning Authorities [LPAs] may need to consider increases to overall levels of housing in order to help deliver the required number of affordable homes (ID: 2a-024). Compared against this delivery, the latest HENA (2024) identifies that to meet this need in full would require – in broad terms – the delivery of around 1,112 dpa (including market and affordable). It then goes onto state that if the Council plans for 400 dwellings per annum to support forecast job growth, even this would meet little more than a third of the</li> </ul>

	<p>evidenced need (para 5.22). Despite this, there is no consideration of whether the Council should seek to increase its housing requirement to help address those needs in accordance with the PPG. By planning for the minimum number of homes identified by the standard method, a considerable shortfall of affordable homes will accrue in the Borough over the plan period. This would manifest in significant real world negative socio-economic effects on both current and future residents across the borough. For example, people in need of affordable housing will not be able to access it in the first instance and those needing more suitable accommodation to meet their needs will continue to go with those needs unmet. More people would fall into affordable housing need because of upward effects on market housing prices, without a corresponding beneficial impact on income via the economic aspects of the plan. This could also result in drivers for unsustainable patterns of development, for example increased commuting, reduced social cohesion, and related environmental effects. Consequently, draft Policy PSD 1 fails to accord with the Framework (for example, paragraphs 15, 20, 60 – 62 inclusive) as it fails to deliver for affordable housing needs.</p> <ul style="list-style-type: none"> <li>• <b>Job growth:</b> whilst we understand that the minimum housing requirement set by Draft Policy PSD 1 has been uplifted to take account of forecast job growth, we consider that this still does not go far enough. For example, evidence suggests that with a housing requirement of 400 dpa, then the employment land need would be 48.2 ha; however, the Council is actually allocating 63 ha. Indeed, Table 2 of the Council's Employment Spatial Strategy Topic Paper (July 2024), states that including the 48.9 ha of existing employment land supply with the potential strategic site allocations would bring the total employment land supply up to 104.6 ha. Consequently, draft Policy PSD1 fails to accord with the Framework (for example, paragraphs 15, 20, 60 – 62 inclusive) as it fails to demonstrate how the housing requirement figure can sustain the actual forecast job growth.</li> <li>• <b>Potential unmet needs:</b> Turley has concluded in previous reports for the two Councils (both the 2015 Stoke-on-Trent and Newcastle-under-Lyme Strategic Housing Market Assessment [SHMA] and the 2017 SHMA Update) that the two authorities comprise a shared Housing Market Area [HMA]. Neighbouring Stoke-on-Trent is a city subject to the 35% uplift to the standard method; and needs to plan for a minimum of 704dpa (noting there may also be reasons for the city needing to plan for more homes than this minimum figure – for example, to support job growth in the city and meet affordable housing needs). We note that the PPG [ID: 2a-034] states that the 35% uplift in the standard method is expected to be met in the cities that it applies too. However, given the combined urban areas that both areas share, Newcastle-under-Lyme should be expected to help meet that need. Stoke on Trent has over the past couple of years, started to fail to meet its housing targets. Over the past three years, the City has delivered 463, 455 and 429 dwellings<sup>1</sup>, below the outdated 2009 Local Plan target of 570 dpa, and well below the current standard method target of 704 dpa. Taking account of the emerging standard method, this would result in an increased target of 1,043 dpa. It would therefore be justified for Newcastle to accommodate any arising unmet need in-so-far as is possible, in line with the Framework (paragraph 35). As such we consider that draft Policy PSD1 fails to afford with the Framework (for example, paragraphs 15, 20, 60 – 62 inclusive) as it fails to properly consider unmet need in Stoke on Trent.</li> <li>• <b>Past and projected housing delivery rates:</b> The PPG [ID: 2a-010], notes that previous levels of housing delivery previous housing delivery can be a reason to plan for more homes than the minimum number of homes needed (as derived from the standard method). In recent years, the Borough has recorded an average of 509 completions (between 2019/20 and 2021/22), with a peak of 630 completions in 2020/21: significantly above the current minimum local housing need. While delivery rates at these levels have only occurred in recent years, the Borough has and clearly can sustain higher levels of housing delivery as evidenced by recent completions. This represents another reason why the Council should look to plan above the minimum number of homes needed. Overall, given the reasons above the Council should reconsider its proposed housing requirement. This would be in the context of the Government objective to significantly boost the supply of homes (as set out in paragraph 60 of the Framework) and noting the aim to delivery 300,000 dpa nationally which requires more homes to be delivered than the standard method outputs nationally. Revisiting the requirement would ensure that at least a greater proportion of development needs – particularly for affordable housing – can be met while considering whether any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 11b of the Framework) as tested through the SA process. It would also account and support for scenarios where job growth is above that currently forecast (i.e. more in line with previous forecasts).</li> </ul> <p>In considering the above, we consider draft Policy fails to meet the tests of soundness for the following reasons:</p> <p>1 It is not positively prepared – The strategy used to identify housing need does not correctly account for affordable housing need or forecasted job growth. It also does not properly consider cross boundary strategic planning in the context of persistent under delivery coupled with an increase in housing need as result of the emerging standard method in Stoke on Trent.</p> <p>2 It is not effective – the housing requirement will fail to deliver the required amount of affordable housing and the amount of housing required to sustain job growth.</p> <p>3 It is not consistent with national policy – it fails to afford with the Framework (paragraphs 15, 20, 60 – 62 inclusive).</p>
<b>Q7 Modification</b>	As such it is recommended that the minimum housing need figure set out in the draft policy is increased to take account of the evidence presented above.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Q10 File 1</b>	6390498
<b>Attachments</b>	<a href="#">1364329 Imogen Zulver.pdf</a>
<b>Comment ID</b>	NULLP984
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Draft Policy PSD 3: Distribution of Development</b></p> <p>Draft Policy PSD 3 sets out that the Rural Centres of Betley &amp; Wrinehill (joint) and Madeley &amp; Madeley Heath (joint) are expected to accommodate in the order of 250 new homes. This is with reference to the settlement hierarchy (draft Policy PSD 2) which notes Rural Centres will meet “some development needs of the Borough commensurate with their role” with the scale of development being “relative to its role, function, and infrastructure capacity”. Whilst we are supportive of the approach set out in respect of the Rural Centres in draft Policy PSD 2., it does not appear that the approach advocated by Policy PSD 2 has been followed through in Policy PSD 3 in respect of distributing development to Rural Centres in an evidence-based way.</p> <p>Considering the policy, we have a number of concerns:</p> <ul style="list-style-type: none"> <li>It is unclear how the 250 home ‘guide’ requirement was determined as being the appropriate amount of development for Madeley &amp; Madeley Heath (in addition to Betley &amp; Wrinehill). There is no assessment of local needs across the different rural centres, nor an assessment of what quantum of housing might be appropriate in each taking account of constraints and both existing infrastructure provision and future needs. Nor is there any comparison between the Rural Centres and the housing proposed, noting each centre has a different role (as per Policy PSD 2).</li> <li>Without this evidence, the proposed distribution of housing is in conflict with Policy PSD 2 which advocates such an approach. This evidence would need to consider the Rural Centres in turn and why the guide amount of housing for Madeley &amp; Madeley Heath is appropriate.</li> <li>The distribution of homes is noted as being a ‘guide’; however, that ‘guide’ figure is treated akin to a requirement in the ‘Site Selection Interim Report’ (2023) that considers the proposed preferred sites based on it meeting a residual requirement (taking account of existing commitments). If the figure is a ‘guide’ rather than a ‘requirement’, the Council should consider whether additional sites in the Madeley &amp; Madeley Heath could and should support the overall objectives of the plan.</li> </ul> <p>In considering the above, we consider draft Policy fails to meet the tests of soundness for the following reasons:</p> <p>1 It is not positively prepared – it does not properly consider the additional sites in Madeley and Madeley Heath.</p> <p>2 It is not justified –no justification has been provided for the distribution of housing and reasonable alternatives for meeting housing need in Rural Centres have not been properly considered;</p>
<b>Q7 Modification</b>	As such it is recommended that the Council consider additional sites in Madeley and Madeley Heath to support overall objectives of the plan including our client’s land interests in ‘Land at Madeley Heath’ (site ref. MD12A, also known as ‘Land Area 2 at Marley Eternit Tiles, Madeley Heath’).
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Q10 File 1</b>	6390498

<b>Attachments</b>	<a href="#">1364329 Imogen Zulver.pdf</a>
<b>Comment ID</b>	NULLP982
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	<p><b>Policy PSD 2: Settlement Hierarchy</b></p> <p>Policy PSD 2 notes that Madeley and Madeley Heath (joint together) form a Rural Centre. In respect of Rural Centres, the policy notes that:</p> <p>"The Rural Centres will meet some of the development needs of the Borough, commensurate to their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character. It is recognised that there are differences between these villages in terms of their size and available facilities and therefore the scale of development in each area should be relative to its role, function and infrastructure capacity."</p> <p>The Council's own evidence base states that the centre of the village of Madeley is within 15 minutes' walk to the centre of Madeley Heath. Together this joint settlement has excellent access to essential services facilities including shops, post office, schools, restaurants GP and dental surgeries, pharmacy no.85 and 1A buses to Newcastle under Lyme and primary and secondary schools (pages 20-21 of the Rural Topic Paper. As such we support the approach set out in respect of the Rural Centres which identifies these as making an important contribution to meet development needs in the borough. We consider this to be sound as it represents an appropriate strategy justified by evidence regarding sustainability of the joint settlement.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Q10 File 1</b>	6390498
<b>Attachments</b>	<a href="#">1364329 Imogen Zulver.pdf</a>
<b>Comment ID</b>	NULLP986
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Madeley Heath Developmental Ltd
<b>Consultee Family Name</b>	Munnery
<b>Consultee Given Name</b>	James
<b>Agent Company / Organisation</b>	Lichfields
<b>Agent Family Name</b>	Zulver
<b>Agent Given Name</b>	Imogen
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site) MD12
<b>Q6 Details</b>	<p>Dear Sir / Madam</p> <p><b>Newcastle under Lyme Regulation 19 Consultation Response</b></p> <p>We write on behalf of our client Madeley Heath Developmental Limited [MHDL] in response to the publication of the final draft Newcastle under Lyme Borough Council [the Council] Local Plan (Regulation 19). This response has been prepared in the context of our client's land interests in 'Land at Madeley Heath' [the Site].</p>

	<p>The site is not proposed to be allocated in the Regulation 19 Local Plan and is retained as Green Belt outside the settlement of Madeley/Madeley Heath as identified on the Policies Map. The consideration of these two distinct areas as a single settlement is supported. The Council has identified a site outside the settlement to meet housing needs in the settlement. However, it is considered that this site is divorced from the wider settlement and represents an inappropriate incursion into the wider open countryside which results in adverse impacts when compared to the reasonable alternatives. The allocation of the subject site to these representations is a reasonable alternative resulting in significantly reduced harm overall, particularly to the wider landscape and open countryside. The proximity of the subject site to the existing urban area and the proximity to the facilities and services it contains ensure that it would represent a more sustainable pattern of development. The development of our site also brings the opportunity to provide a significant benefit in terms of a site for a replacement primary school that can meet future academic needs of the wider area. The development would also deliver much-needed highway access improvements to the junction of Newcastle Road, Keele Road, and Crewe Road. In addition, it would deliver public open space for which there is a recognised deficiency in this area.</p> <p>In terms of the evidence base, this Site was identified as ref. MD12A detailed in the Council's Green Belt Assessment Part 4 2024, also known as 'Land Area 2 at Marley Eternit Tiles, Madeley Heath').</p> <p>This Site is shown edged in red on the plan at Figure 1 below (in attachment)</p> <p><b>Summary</b></p> <p>Overall, the Site adjoins an existing residential area, is in single ownership, unimpacted by significant technical constraints which would prevent delivery and is available now. It is noted that the Council's own evidence base concludes that the Site is considered to be suitable, available and achievable. The site is capable of delivering c. 240 units within the next five years. Overall, the Site is considered to have excellent potential to deliver a substantial number of new homes and new school for Madeley Heath as well other significant planning benefits including much-needed highway improvements and public open space. We would therefore urge that the Council considers the reconsiders the Site for allocation to meet additional needs evidenced in our response to draft Policy PSD 1.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	On behalf of our client, MHDL, we formally request to participate in hearing sessions associated with Draft Policy PSD 1, Draft Policy PSD 2, Draft Policy PSD 3, SA Section 5: Reasonable Alternatives, Draft Policy PSD 5 & Draft Policy MD29. We consider that our representation at the hearing sessions is necessary to ensure our representations above are taken into account for the draft Local Plan to be found sound.
<b>Attachments</b>	<a href="#">1364329 Imogen Zulver.pdf</a>



<b>Comment ID</b>	NULLP421
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Myatt
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Policy AB12 Land East of Diglake Street
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>There is no evidence to support the need for further housing at this point in time based on the demographics for the area whereby the local population has decreased not increased and therefore this should definitely not be at the expense of our greenbelt land which makes the area what it is - rural. The rural nature of the area is what attracts most residents to Bignall End and Audley. Once this greenbelt is destroyed there is no going back and this will be the tip of the iceberg as the initial proposal might be for 125 houses but the builders will keep going back to extend this to a higher number as has happened in Alsager.</p> <p>The current road infrastructure is not designed to cope with an increased volume of traffic which 125 new homes will bring. The proposed site accesses, firstly off Diglake Street or for emergencies via Ravens Lane / B5500 are totally inadequate especially for heavy lorries during the construction phase and for the higher volume of traffic after construction.</p> <p>Additional traffic pulling out of Diglake Street is likely to lead to increased road traffic accidents involving both vehicles and pedestrians, especially as it is near a major crossing point for pupils walking to and from Ravensmead Primary School. This also increases the risk of possible fatalities, particularly as the increased volume of traffic ( especially heavy construction vehicles ) will cause more potholes for cars, motorcycles and bikes to contend with.</p>
<b>Q7 Modification</b>	<p>These proposals appear to conflict with the local plan which states that it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas". How is this happening in practice ? These proposals will destroy the character and distinctiveness of Bignall End which will change from rural to urban. They definitely do not respect nor improve it's rural nature nor it's character and distinctiveness. Therefore I think that this policy should be reviewed and the proposed site withdrawn to be retained as agricultural land / greenbelt as there are plenty of brownfield sites which could be explored before using this greenbelt site.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP345
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Nadin
<b>Consultee Given Name</b>	Michael Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>1 - The area defined as SP23 is understood as being designated Greenbelt.</p> <p>2 - The problems of water "run-off" from SP23 are historical and continuous.</p> <p>3 - The increase levels of traffic &amp; likely congestion on both Cemetery road &amp; the Race Course, from which access will increase the potential risk of harm to those directly associated with the Race Course Academy Primary school.</p> <p>4 - The continuing works at Walley's quarry (until 2042) have neither been considered &amp; adequately assessed as to the potential risk of harm to human health.</p>
<b>Q7 Modification</b>	<p>1 - Maintain the area as Greenbelt &amp; find an alternative site for the housing development.</p> <p>2 - Conduct an in depth Hydrology impact assessment that includes the Topography of the development site, giving full consideration to the problems associated with the known water run-off problems.</p> <p>3 - Conduct an in depth traffic impact assessment to include &amp; giving due consideration to the increased risk of harm, at and around Cemetery road and the Race Course Academy Primary school.</p> <p>4 - Conduct a health risk assessment on human health hazards associated from the continuous workings of Walley's quarry up to 2042 &amp; beyond.</p>
<b>Comment ID</b>	NULLP347
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Nadin
<b>Consultee Given Name</b>	Michael Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site G&T
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I wish to register my opposition to this part of the draft plan.</p> <p>1) The area designated is land identified for the provision &amp; sole use for garden allotments.</p> <p>2) Access to the proposed development site is shown to be via the Racecourse area of Silverdale. This will lead to an increase of motorised traffic that passess directly the Racecourse Academy Primary school.</p> <p>3) Although 5 pitches are planned, the size of the site is such that more could be allocated in the future.</p>
<b>Q7 Modification</b>	<p>1) a- Find an alternative location. b- Keep the area for its intended purpose of allotments under the guidance of Silverdale Parish Council. There is a shortage of allotment sites both locally &amp; nationally I'm of the opinion that allotments will increase in the value to individuals in the future.</p> <p>2) Conduct an in depth traffoc impact assessment to include the potential increased risk of harm at and around the areas surrounding the Racecourse Academy Primary school</p> <p>3) Formally limit the number of allocated pitches.</p>
<b>Comment ID</b>	NULLP344
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Nadin
<b>Consultee Given Name</b>	Michael Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I wish to register my opposition to the draft policy SP11.</p> <p>1) The proposed developments SP11 (1), SP11 (2), SP11(3) SP11(4) all lie within areas understood as being Greenbelt.</p> <p>2) The development of SP11 (3) will substantially increase the level of traffic through the village of Silverdale which is already suffering from "traffic overload" &amp; serious "parking issues" on both of the main arterial routes of Church Street &amp; the High Street.</p>

	<p>3) The development of SP11(4) will also increase the level of traffic both through the village of Silverdale but in particular to the "Racecourse" area that has the potential to increase the risk of harm (vehicle/pedestrian collision) to the pupils, staff &amp; parents directly associated with the Racecourse Academy Primary school.</p> <p>4) The SP11 development site has been identified, from a BDP report, as being;</p> <p>Quote: - "Flood Zone 1 - (low probability of flooding - less than 0.1% probability, but is susceptible to some, limited surface water flooding during heavy downpours".</p> <p>This comment is hardly surprising as water runs downhill!</p> <p>The problems of water "run-off" from the golf course site (SP11) causing water flooding issues in Silverdale are historical &amp; well known both locally and by NUL BC. Works have been undertaken over the years to eliviate the problems being experienced at that time, with limited success! Problems are still being experienced today in areas of existing housing developments! Individual streams of water are known to have always &amp; contiuously drained from the golf course (SP11) &amp; (SP23) areas on a 24/7 basis creating wet lands on the lower regions of the two areas and have never been known to run dry! Evidence of this can be seen today! Should such developments of SP11 &amp; SP23 be undertaken, assuming that adequate solutions are found to eliviate the 24/7 water "run-off" conditions, is the existing drainage &amp; infrastructure in the village of Silverdale sufficiently adequate in its. size, condition &amp; capacity to accommodate any increase of directed water flow?</p> <p>My objection is that the draft local plan has omitted &amp; has failed to acknowledge any reference to the historical problems of water "run-off" from the development of the SP11(1 - 4) &amp; SP23 areas &amp; the consequence of assessed likelihood to any future potential problems that maybe encountered by the residents living in the valley of Silverdale.</p> <p>5) No guarantee is given in the draft that should SP11 (1 - 4) development proceed in its present format, that the 30% affordable housing initiative being applied is to each of the 4 development areas individually! In order to facilitate with the objectives of the housing initiative it is important to me that the 30% affordable housing is NOT one that is adopted as a collective for the site!</p>
<b>Q7 Modification</b>	<p>1) a- Maintain SP11 area as Greenbelt. b- Develop further the expanse of woodland between Red Heath wood &amp; Job's wood, encouraging a greater bio-diversity for the whole area.</p> <p>2) a- Curtail the size of the development. b- Conduct an indepth traffic impact assessment to include &amp; give due consideration to the existing traffic problems that are associated to the village of Silverdale.</p> <p>3) a- Curtail the size of the development. b- Conduct an in depth traffic impact assessment to include &amp; give due consideration to the increased risk of harm at and around the areas surrounding the Racscourse Academy Primary school.</p> <p>4) a- Curtail the size of the development. b- Conduct an in depth Hydrology impact assessment to include to Topography of the development areas and to include &amp; give due consideration to the potenntial of increased risk of flooding in the lower areas of habitation within the village of Silverdale.</p> <p>5) That the 30% housing initative is set as being a mandatory requirement applicable to each area of housing developments individually by the NUL planning department to the developers and is not one that is governed by the housing developer to the NUL planning department.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To express my concerns directly

<b>Comment ID</b>	NULLP207
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Family Name</b>	Nelson
<b>Consultee Given Name</b>	Alison
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I am sure that everyone involved in creating the Local Plan has committed to set out a positive proposal for the area. It cannot be an easy task. My comments relate wholly to AB2 (subregional exemplar business park) and I would argue that the premise of choosing the site based on it's good transport links is unsound. As a resident on Barthomley Road for over 20 years I have seen traffic worsen year on year with more people diverting from the M6 and A500 when there are delays and using local roads, including Barthomley Road as a cut through to get back to the J16 roundabout through Barthomley village. The road is a national speed limit but is used by many different groups, the farming community incl tractors and milk tankers, and many walkers (lots of public rights of way) horse riders, cyclists, runners etc and it is unsafe as it is at the moment nevermind when traffic will inevitably increase with `AB2.</p> <p>Also, as this is a rural location, any increase in traffic causes extra risk to our local wildlife, including badgers, bats, foxes, hares, swallows, dragonflies etc.</p>
<b>Q7 Modification</b>	<p>I feel the choice of site is completely wrong, based on existing traffic issues locally whenever there is a problem on either the M6 or the A500. One often affects the other. Nothing I have read in the Local Plan seems to accept this and to offer a strategy. Barthomley Parish have put restrictions on Audley Road banning vehicles over a certain weight. There is currently no restriction like that from Audley Parish. Perhaps a dark/quiet lane status for these farm roads that are already being badly affected with motorway traffic.</p> <p>The Local Plan only sets a minimum of hectares for AB2. I would suggest that a sensible maximum is set instead in keeping with its green belt status to show the councils' sparing use of our valuable resources and retaining them for future generations.</p>

<b>Comment ID</b>	NULLP1503
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Nelson
<b>Consultee Given Name</b>	Chris
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I write to express my comments and objections regarding the AB12 proposed development in Bignall End and wish to share the following points against this development:</p> <ul style="list-style-type: none"> <li>* The local schools do not have enough places for potential pupils from an additional and unnecessary development</li> <li>* the local Health Centre does not have the capacity to take on board the potential population from an additional estate.</li> <li>* the traffic on Ravens Lane is already very busy at all times and the new estate would add to the current congestion</li> <li>* There is already regular flooding on the AB12 site adjacent to a river making it unsuitable for proposed development</li> <li>* there is a bat population that circles through the field when feeding; the development would disrupt this important and endangered species. In the flooded area at the top end of the field there has always been a population of newts and frogs.</li> <li>* my property [redacted by admin] as well as other properties on Ravens Lane has rear access via the road between [redacted by admin] Ravens Lane. This right of way is on my property's deeds of which a copy can be provided upon request and has been used by me and other residents for rear property access; for me this has been since 2010 when we moved into the property. This was on my deeds and the prior owner also used this as right of way.</li> <li>* we have a loft conversion and large balcony area at the rear of our house which we use as a garden. The proposed development will overlook our private space and our bedroom. Sitting on our balcony will put us in full view of all of the homes that may be built.</li> </ul> <p>Finally, I am shocked that the wrong email address was given out to residents. One may feel this was done on purpose to prevent local residents from having their voice heard. The address on the attached document is clearly wrong.</p>
<b>Q10 File 1</b>	6392622
<b>Attachments</b>	<a href="#">pro-ULIAXtN8.jpeg</a>

<b>Comment ID</b>	NULLP813
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Nelson
<b>Consultee Given Name</b>	Lucy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>To Whom it May concern,</p> <p>I write to express my comments regarding the AB12 proposed development in Bignall End and wish to share the following points against this development:</p> <ul style="list-style-type: none"> <li>* The local schools do not have enough places for potential pupils from an additional and unnecessary development</li> <li>* the local Health Centre does not have the capacity to take on board the potential population from an additional estate.</li> <li>* the traffic on Ravens Lane is already very busy at all times and the new estate would add to the current congestion</li> <li>* There is already regular flooding on the AB12 site adjacent to a river making it unsuitable for proposed development</li> <li>* there is a bat population that circles through the field when feeding; the development would disrupt this important and endangered species. In the flooded area at the top end of the field there has always been a population of newts and frogs.</li> <li>* (redacted by admin) as other properties on (redacted by admin) has rear access via the road between (redacted by admin) This right of way is on my property's deeds of which a copy can be provided upon request and has been used by me and other residents for rear property access; for me this has been since 2010 when we moved into the property. This was on my deeds and the prior owner also used this as right of way.</li> <li>* we have a loft conversion and large balcony area at the rear of our house which we use as a garden. The proposed development will overlook our private space and our bedroom. Sitting on our balcony will put us in full view of all of the homes that may be built.</li> </ul> <p>I look forward to your response to the above points.</p>



<b>Comment ID</b>	NULLP172
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Newman
<b>Consultee Given Name</b>	Geraldine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p><b>OBJECTING TO REGULATION 19 – FINAL LOCAL PLAN.</b></p> <p>I can only imagine the mountain of paperwork you will have to peruse in relation to these proposed developments, but please spare a thought for those of us who are unable to respond in the well informed, articulated manner you would prefer, but nonetheless, as a resident of Bignall End for over 50 years, my concerns are real and I feel should be seriously considered when making your final decision – thank you.</p> <p><b>POLICY AB12 – LAND EAST OF DIGLAKE STREET</b></p> <p>I cannot argue against the fact that AFFORDABLE new dwellings are needed; this is a countrywide problem!</p> <p>However, I believe that this proposed site is an affront to the hard-working residents of Bignall End who have invested in their homes and who could now face traffic congestion the likes of which is incomprehensible and exceedingly dangerous. To me, it comes across as a total lack of consideration for the needs of existing residents, and is purely profit driven.</p> <p>Bignall End is a village, it was built as a village and has been added to with respect for its village status.</p> <p>The immediate area in question consists of terraced houses located on narrow angled roads. Resident parking has been an issue for many years.</p> <p>There is a nursery located at the top of one of the roads, and an integrated school for nursery children/infants/junior school children within 5 minutes of the proposed development.</p> <p>It is beyond my comprehension that in addition to the above, it is proposed to allow either access/egress via Ravens Lane. Putting aside the chronic parking issue, it's on a bad bend in the road – you can neither see traffic coming up or down until you are on the bend.</p> <p>Ravens Lane – the main through road for Bignall End and surrounding areas – simply cannot take more traffic, of any description.</p> <p>Even without the addition of further development, the current parking situation is quite frankly dangerous, as it leaves a narrow corridor for all traffic, with not everyone willing to give way; and unfortunately anyone with the use of a drive, has to take a leap of faith when leaving their drive as both ways are evidently obstructed with parked vehicles; and when entering their drive find it a necessity to use their hazard lights (and obviously their indicator) in an attempt to forewarn drivers following them of their intentions.</p> <p>I don't pretend to understand the impact such a development will have on the sewer systems, the flood plains, natural habitats of the plants and animals nor the various Assessments that will need to be presented and scrutinised. But I do understand the need for adequate</p>

Doctors, Dentists, Hospitals, Social Services and Facilities, Bus Services, etc – which I believe are currently non-existent or severely stretched to their limits, even without the addition of more housing. The infrastructure needed is not there and I don't believe adequate contributions from the developers would be forthcoming – quite naturally it is taken as a given that the developers are profit driven – and I believe the funds needed to improve roads, provide health-care, schools, nurseries, hospitals, etc., etc would simply not make it a viable project for them.

As an aside, in the Chesterton area there are new builds currently in progress. Some are being built on land that previously contained dwellings; some are being built on vacant, un-used commercial land. All have existing roads which will accommodate this increase in dwellings.

My point being that suitable land is available, but it just doesn't make sense, on any level, to propose this particular site – it simply isn't a viable option.

<b>Comment ID</b>	NULLP173
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Newman
<b>Consultee Given Name</b>	Geraldine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p><b>OBJECTING TO REGULATION 19 – FINAL LOCAL PLAN.</b></p> <p>I can only imagine the mountain of paperwork you will have to peruse in relation to these proposed developments, but please spare a thought for those of us who are unable to respond in the well informed, articulated manner you would prefer, but nonetheless, as a resident of Bignall End for over 50 years, my concerns are real and I feel should be seriously considered when making your final decision – thank you.</p> <p><b>POLICY AB15 – LAND NORTH OF VERNON AVENUE</b></p> <p>I cannot argue against the fact that AFFORDABLE new dwellings are needed; this is a countrywide problem!</p> <p>The issue here is that this is an area that has already accommodated new housing and I believe that a further development is not feasible; a further 33 homes would bring the same problems as the other proposed developments, such as:-</p> <p>In the first instance, Vernon Avenue services the Wereton estate and already has its own traffic/parking problems.</p> <p>Audley's roads are small, as you would expect from a village, and congestion is already an issue - not only with their own residents, but residents from the surrounding villages.</p> <p>I don't pretend to understand the impact such a development will have on the sewer systems, the flood plains, natural habitats of the plants and animals nor the various Assessments that will need to be presented and scrutinised. But I do understand the need for adequate Doctors, Dentists, Hospitals, Social Services and Facilities, Bus Services, etc – which I believe are currently non-existent or severely stretched to their limits, even without the addition of more housing.</p>

The infrastructure needed is not there and I don't believe adequate contributions from the developers would be forthcoming – quite naturally it is taken as a given that the developers are profit driven – and I believe the funds needed to improve roads, health-care, schools, nurseries, hospitals, etc., etc would simply not make it a viable project for them.

At the risk of repeating myself, in the Chesterton area there are new builds currently in progress. Some are being built on land that previously contained dwellings; some are being built on vacant, un-used commercial land. All have existing roads which will accommodate this increase in dwellings.

My point being that suitable land is available, but it just doesn't make sense, on any level, to propose this site – it simply isn't a viable option.

<b>Comment ID</b>	NULLP171
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Newman
<b>Consultee Given Name</b>	Geraldine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>OBJECTING TO REGULATION 19 – FINAL LOCAL PLAN.</b></p> <p>I can only imagine the mountain of paperwork you will have to peruse in relation to these proposed developments, but please spare a thought for those of us who are unable to respond in the well informed, articulated manner you would prefer, but nonetheless, as a resident of Bignall End for over 50 years, my concerns are real and I feel should be seriously considered when making your final decision – thank you.</p> <p><b>POLICY AB2 – LAND AT JUNCTION 16 OF THE M6</b></p> <p>My understanding is that the proposed site would be 4 x larger than the Council say the developers need, leading to an employment/housing ratio which may well leave the door open for even more future housing development.</p> <p>Looking into it a little further; with no transport links for employees other than cars, and excessive numbers of HGV's/vans to support the businesses visiting the site, surely this would culminate in added air/noise/light pollution and increased traffic through our villages.</p> <p>I don't pretend to understand the impact such a development will have on the sewer systems, the flood plains, natural habitats of the plants and animals nor the various Assessments that will need to be presented and scrutinised.</p> <p>But I do believe that the infrastructure needed is not there and I don't believe adequate contributions from the developers would be forthcoming – quite naturally it is taken as a given that the developers are profit driven – and I believe the funds needed to provide the necessary services and improve the roads, etc would simply not make it a viable project for them.</p> <p>Why cannot existing viable un-used or under-used sites located in commercial or neglected areas of the Potteries be utilised, where relevant road links already exist and where re-generation programmes could surely accommodate the developer's needs?</p>

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<b>Comment ID</b>	NULLP124
<b>Order</b>	186
<b>Title</b>	Policy KS18 Land North of Lower Milehouse Lane, Knutton
<b>Consultee Family Name</b>	Newman
<b>Consultee Given Name</b>	Susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KS18
<b>Q6 Details</b>	<p>Dear Sir/ Madam,</p> <p><b>Re. Building plans KS18 - houses on parking area adjacent to Ex-serviceman's Club, High Street, Knutton</b></p> <p>I am writing on behalf of the Parochial Church Council (PCC) of St Mary's Church, Knutton. The PCC are concerned that the above development will affect parking areas that the Church currently utilises. Parking outside the Church not only causes inconvenience to our neighbours, but is also a serious safety issue in that it causes congestion on the very busy Church Lane.</p> <p>We have, for a considerable time done our best to mitigate this by encouraging people who attend our Church, for services, events, weddings and funerals, to park on the carpark adjacent to the Ex-Servicemen's club, accessed from High Street Knutton, so as to alleviate the situation. The Church was built 150 years ago, when parking was not an issue, but times change. Our Church is still very much an integral part of the Knutton community and we feel that we should make it as accessible as possible, in a safe and sensible way. Many of our congregation and visitors struggle to walk far.</p> <p>We are seeking reassurance that the proposed building works and subsequent dwellings will not take away the only parking area near to us. We hope that the council take our concern seriously and are able to alleviate our concerns</p> <p>Yours faithfully</p> <p>Susan Newman (Secretary to the PCC)</p>

<b>Comment ID</b>	NULLP902
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Nix
<b>Consultee Given Name</b>	Ruth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>There is very poor accessibility for this development - local roads are past capacity at peak times already, being very narrow and difficult to access. It would be well high impossible to deliver. So unsound</p> <p>This area is prone to flooding already and this would be exacerbated by this development on to greenbelt high quality land. That would affect climate quality and contributions to local food production. The area would be impossible for extra parking and dangerous for children and other pedestrians.</p> <p>The capacity of our local schools, health centre and dentists etc would be stretched even further. This is not justified, so is unsound.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove this allocation from the local plan.
<b>Comment ID</b>	NULLP904
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Nix
<b>Consultee Given Name</b>	Ruth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I consider this part to be unsound (AB2) as the traffic levels are already high around Junction 16 near Audley. If here is a problem on the M6, traffic comes through Audley Village to avoid it already. This amount of warehousing will increase the traffic considerable. It would need a massive restructuring of the area around Junction 16. The amount of finance needed will not be forthcoming from Highways England due to shortfall in the national finances, during the end of the plan in 2040, which makes it unsound.</p> <p>There was an accident on the stretch of the A500 Friday 30th October 2024 (causing a fatality) near Audley- This caused chaos and traffic jams right back into Audley.</p> <p>The high growth strategy applied by Newcastle ULBC has no evidence to support it, therefore it is unsound. The amount of jobs created by this warehousing may or may not be correct, but will cause a lot more traffic, more residents, need for parking. We have little space to park in Audley now, and it is often 'jam packed' in the village, so it is unsound as there is no space for more car parks.</p> <p>The amount of warehousing required is said to be 22Ha of strategic employment, by NULBC. However, they are planning to allocate 80Ha at this site alone (AB2). We would also lose valuable greenbelt on the edge of our village, which is much needed for health and wellbeing, so environmentally it is not sound.</p> <p>The lanes near this site are very narrow and unsuitable for extra traffic, which this development would generate, even if there was better access from the A500/M6. Unsound due to traffic blockages, danger to local residents and pedestrians.</p>
<b>Q7 Modification</b>	To render the local plan sound, remove this large warehousing plan from it. There are nearby warehousing not being utilised.



<b>Comment ID</b>	NULLP570
<b>Order</b>	115
<b>Title</b>	Policy SE8: Biodiversity and Geodiversity
<b>Consultee Company / Organisation</b>	Naturespace Partnership
<b>Consultee Family Name</b>	Northrop
<b>Consultee Given Name</b>	Claire
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE8
<b>Q6 Details</b>	<p>We wish to draw attention to the Great Crested Newt District Licencing Scheme, for which Newcastle Under Lyme Borough Council hold the licence that has been granted by Natural England. NatureSpace is the delivery partner of this scheme working with the Council.</p> <p>Supporting text that explains that you have a District Licence Scheme available for use could be included as part of the pre-text for your Biodiversity Policy SE8, if you feel this would be appropriate. The following text is given as an example of a paragraph that you could use or adapt as you see fit:</p> <p>Newcastle Under Lyme Borough Council holds a Great Crested Newt Organisational (or 'District') Licence granted by Natural England. The associated District Licensing Scheme, which is currently administered and managed by NatureSpace Partnership, provides an alternative licensing option for developers to address impacts on protected great crested newts by enabling a 'conservation payment' towards high quality habitat creation and long-term management and monitoring. In the District Licensing Scheme, developers can engage with NatureSpace at the pre-application stage or at the planning application stage. It is based on a great crested newt landscape-scale conservation strategy, which aims to focus the creation of new habitats where they will be of maximum benefit to the species, whilst also reducing risk and uncertainty through the planning process for developers and planning authorities. The strategy results in a range of other biodiversity benefits and contributes towards nature recovery at the landscape scale.</p> <p>The following paragraph is a suggested Definition of the District Licence Scheme that could be used in the Local Plan Glossary:</p> <p>District Licensing or DL is used to describe a new approach to authorising developments affecting great crested newts, by focusing conservation efforts where it will create maximum benefit for the species - whilst reducing delays, costs, risks and uncertainty for developers. Newcastle Under Lyme Borough Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England so in this authority an additional licensing option for developers is available that enables new sustainable development whilst also conserving great crested newts (and wider biodiversity).</p> <p>If there is any scope to include reference to the Council's great crested newt District Licence in the Local Plan, we would consider this would be beneficial to raise awareness of the Scheme and support sustainable development in your area where there is a risk to great crested newts.</p>

<b>Comment ID</b>	NULLP430
<b>Order</b>	195
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Nutbeem
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29
<b>Q6 Details</b>	<p>Cannot comment on other sites, but regarding Bar Hill, which is also under planning and which many people have already responded on (planning reference 23/00979/OUT.)</p> <p>Many comments have been put on regarding that application, and I hope and expect that those comments are taken into consideration when assessing this new local plan. They should be</p> <p>Governments view to use Grey belt land. The land on bar hill is green belt – fully agricultural, no grey or brown site influences whatever. With farming being a national security (food) concern now. Removal for houses seems contrary. This has been highlighted many teimes from this policy, not just on Bar Hill but others</p> <p>I see the plan was in the last years local plan draft. It has not taken long for the above said planning application to come in following that, even though the land is not approved yet for use. And the same number of houses too.</p> <p>This plan 23/00979/OUT has currently been rejected or at least has by National Rail. Referring to Network rail response 26/06/24 in the above planning application. To quote “</p> <p>“Network Rail is submitting some additional comments to those submitted below. This is a high-risk slope washout and a known flooding site - NR notes that this is a perennial problem site at the site.”</p> <p>“Network Rail would emphasize the importance that the railway cannot accept any amount of surface or sub-surface runoff, either directly from the new development or via highways or other avenues.”</p> <p>And more importantly</p> <p>“NO works are to commence until with agreed Network Rail”</p> <p>Why continue with considering planning on a site that has serious issues and risks to the national transport infrastructure</p> <p>This land was part of HS2 safeguarding area</p> <p>And though that is cancelled it is currently still being subjected to site and survey work by HS2.</p> <p>The area may now get utilized again following the release of the proposed Midland-North west Rail plan by the Birmingham /Manchester mayors (HS2 is all but name), as all the government planning regarding it us still in place, so would be utilized again</p> <p>Notification – walking round Madeley. I found one indication of the prospective work that may be done – on the very last signpost in the village going towards Woore. Not exactly obvious and informative of a major change to the village and environment</p> <p>I note that the Baldwins gate development (LW74) was not on the draft plan, but has been added to the final one, and also apparently planning permission been passed too, with the land starting to be cordoned off</p> <p>The policy says, To fully mitigate the proposed new housing further educational infrastructure would be required at both primary and secondary school phases. Therefore, education contributions will be required to make these developments acceptable in planning terms. The Infrastructure Delivery Plan identifies that the site should make a contribution towards a further expansion at Madeley High School and an expansion to Sir John Offley CE (VC) Primary School.</p> <p>And would that happen before or afterwards. As we know on many housing developments, the proposed extra facilities (the caveat for building house to be agreed) for a community never happen, or happen very, very late and inadequately.</p> <p>So educational infrastructure would be required at both primary and secondary school phases – If any housing development was green lit, I would expect the additional infrastructure to be built beforehand, otherwise all students from the new builds will be travelling away from the village, so increases car usage and travel. Emissions etc.</p> <p>I object to this proposal</p>
<b>Comment ID</b>	NULLP429
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Family Name</b>	Nutbeem
<b>Consultee Given Name</b>	Roy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29

<p><b>Q6 Details</b></p>	<p>Cannot comment on other sites, but regarding Bar Hill, which is also under planning and which many people have already responded on (planning reference 23/00979/OUT.)</p> <p>Many comments have been put on regarding that application, and I hope and expect that those comments are taken into consideration when assessing this new local plan. They should be</p> <p>Governments view to use Grey belt land. The land on bar hill is green belt – fully agricultural, no grey or brown site influences whatever. With farming being a national security (food) concern now. Removal for houses seems contrary. This has been highlighted many times from this policy, not just on Bar Hill but others</p> <p>I see the plan was in the last years local plan draft. It has not taken long for the above said planning application to come in following that, even though the land is not approved yet for use. And the same number of houses too.</p> <p>This plan 23/00979/OUT has currently been rejected or at least has by National Rail. Referring to Network rail response 26/06/24 in the above planning application. To quote “</p> <p>“Network Rail is submitting some additional comments to those submitted below. This is a high-risk slope washout and a known flooding site - NR notes that this is a perennial problem site at the site.”</p> <p>“Network Rail would emphasize the importance that the railway cannot accept any amount of surface or sub-surface runoff, either directly from the new development or via highways or other avenues.”</p> <p>And more importantly</p> <p>“NO works are to commence until with agreed Network Rail”</p> <p>Why continue with considering planning on a site that has serious issues and risks to the national transport infrastructure</p> <p>This land was part of HS2 safeguarding area</p> <p>And though that is cancelled it is currently still being subjected to site and survey work by HS2.</p> <p>The area may now get utilized again following the release of the proposed Midland-North west Rail plan by the Birmingham /Manchester mayors (HS2 is all but name), as all the government planning regarding it us still in place, so would be utilized again</p> <p>Notification – walking round Madeley. I found one indication of the prospective work that may be done – on the very last signpost in the village going towards Woore. Not exactly obvious and informative of a major change to the village and environment</p> <p>I note that the Baldwins gate development (LW74) was not on the draft plan, but has been added to the final one, and also apparently planning permission been passed too, with the land starting to be cordoned off</p> <p>The policy says, To fully mitigate the proposed new housing further educational infrastructure would be required at both primary and secondary school phases. Therefore, education contributions will be required to make these developments acceptable in planning terms. The Infrastructure Delivery Plan identifies that the site should make a contribution towards a further expansion at Madeley High School and an expansion to Sir John Offley CE (VC) Primary School.</p> <p>And would that happen before or afterwards. As we know on many housing developments, the proposed extra facilities (the caveat for building house to be agreed) for a community never happen, or happen very, very late and inadequately.</p> <p>So educational infrastructure would be required at both primary and secondary school phases – If any housing development was green lit, I would expect the additional infrastructure to be built beforehand, otherwise all students from the new builds will be travelling away from the village, so increases car usage and travel. Emissions etc.</p>
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<b>Comment ID</b>	NULLP343
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	O'Dwyer
<b>Consultee Given Name</b>	Duran
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	The strategic employment site at Junction 16 of the M6 is far out of town, inaccessible by public transport and built on a greenfield site. It would also increase traffic on the already crowded A500. This sort of development is clearly unsustainable and unsound.
<b>Q7 Modification</b>	Remove the Junction 16 strategic employment site from the local plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP5
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Family Name</b>	O'sullivan
<b>Consultee Given Name</b>	Aaron
<b>Agent Family Name</b>	O'sullivan
<b>Agent Given Name</b>	Aaron
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p><b>Why the Plan is Not Sound:</b></p> <p>While Policy IN2 addresses the need for sustainable transport and includes provisions for electric vehicle (EV) infrastructure, it is not sound due to several key shortcomings:</p> <ol style="list-style-type: none"> <li><b>Lack of Specificity:</b> The policy lacks clear, measurable targets for the deployment of EV infrastructure. It does not specify the number, type, or location of EV chargers that should be installed, particularly in areas like Kidsgrove where the current infrastructure is inadequate.</li> <li><b>Inadequate Existing Infrastructure:</b> The policy does not sufficiently address the need to upgrade existing EV infrastructure. For instance, the 7kW chargers at Tesco in Kidsgrove are outdated and insufficient to meet current demand, and there is no mention of upgrading them to higher-output chargers.</li> <li><b>Insufficient Implementation and Monitoring Strategy:</b> There is no detailed plan for the implementation and monitoring of EV infrastructure, which raises concerns about the policy's deliverability within the plan period to 2040. Without clear guidelines on funding and timelines, the policy may fail to achieve its objectives.</li> <li><b>Alignment with National Policy:</b> Although the policy aims to support sustainable transport, it does not fully align with the National Planning Policy Framework (NPPF) because it lacks the detail and ambition needed to support the rapid adoption of EVs and ensure long-term sustainability.</li> </ol>
<b>Q7 Modification</b>	<p><b>What Should Be Changed:</b></p> <ol style="list-style-type: none"> <li><b>Set Clear and Measurable Targets:</b> The policy should include specific targets for the number and type of EV chargers to be installed. This should be based on current and projected demand, with a focus on areas like Kidsgrove that currently have insufficient infrastructure.</li> <li><b>Upgrade Existing Infrastructure:</b> The policy should include provisions to upgrade existing EV infrastructure, such as replacing 7kW chargers with higher-output units (50kW or more). This would ensure that the existing infrastructure can meet the growing demand for EV charging.</li> <li><b>Develop a Detailed Implementation and Monitoring Strategy:</b> The policy should be supported by a clear implementation plan with timelines, funding mechanisms, and monitoring processes. This would ensure that the EV infrastructure is delivered effectively and on time, making the policy more effective and deliverable within the plan period.</li> <li><b>Strengthen Alignment with National Policy:</b> To better align with the NPPF, the policy should incorporate more detailed provisions for EV infrastructure that support the transition to sustainable transport. This includes ensuring that the infrastructure is not only available but also accessible, equitable, and sufficient to meet future demand.</li> </ol>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP75
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Oakley
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>As a resident of Loggerheads, I wish to comment on the Newcastle-Under-Lyme Local Plan specifically with reference to page 129 "Policy LW53 Land at corner of Muckleston Wood Lane, Loggerheads." Despite the planning Committee turning the application down recently (27 February 2024), this parcel of agricultural land has been resurrected as a preferred site for development without further reference to the wishes of the Committee, local residents or the general consensus of the community of Loggerheads. It is a failure to co-operate within the framework of procedures. It appears the only reason this site has been earmarked is because the agricultural land has become speculatively available for sale, for one reason or another. This is not a good enough reason in itself to press ahead regardlessly with this development.</p> <p>Why is LW53 NOT a sustainable location:</p> <ul style="list-style-type: none"> <li>*Poor local transport - only six buses per day (5.45pm to Loggerheads from Hanley is the last bus of the day).</li> <li>*Inaccessable GP surgery - Ashley surgery is 39 minutes walk and along lanes without pavements would be a danger to anyone waking, pushing a pushchair or wheelchair, or accompanying young children.</li> <li>*The junction of Muckleston Wood Lane and A53 by its nature is a very precarious or even dangerous and there has been a fatality there. Crossing on foot or by car is near impossible, even with traffic moving at 30 mph (which is rare).</li> <li>*Loss of versatile agricultural farmland (contrary to Paragraph 180 of the NPPF 2023)</li> <li>*LW53 is adjacent to the Grade II listed building of White House Farm and would harm the setting of this building.</li> <li>*A proposal of 450 dwellings without justification to the small village of Loggerheads which has already seen a number of new build over the past two years is stretching the infrastructure past its limits.</li> <li>*Lack of infrastructure: With only one junior and primary school locally, secondary school children and college students would need to find transport out of the area. There is a limited choice of retail and leisure facilities locally. No dentist surgery locally, unless a patient can get an appointment in Market Drayton - a ten mile round trip, or Eccleshall ( no bus link).</li> <li>*Traffic : Placing families in a rural setting will inevitably mean upwards of 900 cars, not to mention service vehicles, which will result in further pollution.</li> <li>*The development of is outside the village envelope of the Village Plan. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and rural setting of this part of Muckleston Wood Lane.</li> </ul> <p>In conclusion:</p> <p>In my opinion the Local Plan in general is sound, apart from the comments I have highlighted above, where the planning has failed to take into account the Planning Committee's decision to disregard planning application of LW53. The fact that the land is available for sale as agricultural land is not a reason for making it available to development for housing.</p>



<b>Comment ID</b>	NULLP88
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Odams
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site 8
<b>Q6 Details</b>	<p>Dear Sir / Madam,</p> <p>I wrote to give my comments on the Local Plan, with specific comments on the proposal to place five gypsy and traveller caravan plots on the site of the Acre Allotments in Silverdale.</p> <p>Firstly on the Local Plan as a whole: I support more housing for the Borough. As a parent of children who will soon look to rent their own homes, I am firmly of the view we need as much good quality, affordable housing in areas with public transport links as possible. It is sensible for the Borough to choose these sites itself rather than have Government intervention on their placement. As a resident of (redacted by admin) I will be directly affected by the proposal to build housing opposite to my house and I still support it.</p> <p>In terms of the Acre Allotment site in Silverdale, of which I am Treasurer, I understand the need and requirement to provide alternative provision to the existing site at Cemetery Road. Speaking from my personal position, not on behalf of the Committee or other plot holders, I do not have a problem with the use of a currently unused area of the allotment site being used for this purpose. I would, however, draw your attention to the following:</p> <ul style="list-style-type: none"> <li>- The proposed access from Park Lane is completely unsuitable. The path / unsurfaced road through the allotments is not wide enough, is in poor condition and is also a public footpath. Its use would require the existing gates to the allotment site to be left open, making the site insecure and the car park open to unauthorised camping, flytipping etc. It would be far more sensible to open the existing access from Cemetery Road and create a short section of road to access the proposed traveller plots.</li> <li>- We believe, from previous surveys and discussions with the Borough council, that the proposed land earmarked for the proposed traveller plots to be contaminated, possibly with asbestos. We were quoted many thousands of pounds to clear it some years ago. The council should assess the possible contamination with some urgency: it may make the use of the land financially unviable.</li> </ul>

<b>Comment ID</b>	NULLP1349
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Ottley
<b>Consultee Given Name</b>	Brenda
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1406
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Ottley
<b>Consultee Given Name</b>	Brenda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b> WE HAVE READ THE CONTENTS OF THE RESPONSE FORM IN RELATION TO REGULATION 19 OF THE LOCAL PLAN AND WE ARE IN FULL AGREEMENT WITH THE CONTENTS THROUGHOUT</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1407
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Ottley
<b>Consultee Given Name</b>	Derek
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

**Additional Comments:**

WE HAVE READ THE CONTENTS OF THE RESPONSE FORM IN RELATION TO REGULATION 19 OF THE LOCAL PLAN AND WE ARE IN FULL AGREEMENT WITH THE CONTENTS THROUGHOUT

<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1350
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Ottley
<b>Consultee Given Name</b>	Derek
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be</p>



	<p>seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP154
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Morning I am a local resident and would like to put my views across, don't know if i have come to the page or not but, I can not express enough how much Newcastle Under Broughy planning to building on houses, warehouses ect this is up setting and unsettling this is for our area! As me my family old generations and new generations have grown up around!</p> <p>2024 and 2025 and the furniture up and coming generations is a scary world to live in today. (Kinfe crime, bullying, break in ect...! )</p> <p>I get that you like to build to bright and beautiful future for people but come on the is a green environment area for people to enjoy! And your taking that all away form us.</p> <p>I am coming into my 50 and I listen to people talk about the younger generations dare not even come out there houses, the young generations moving, schools due to all of the above or even up rooting everything but sad to go (). Has the surroundings Audley, Wood Lane, Bignall end areas all been a safe place to live!</p> <p>The roads are compacted with congestion of cars, lorry's especially when the A500 is shut off due to accidents on the locale junctions from 18 right down to 15.</p> <p>We have now double parking no the main road in Bignall End predictions are unfortunately can not get passed on the pavements, parking on the bends an accident waiting to happen. It will only a child or animals to run out, as drives are unable to see around.</p> <p>Our local School have no wear to park their cars they take to the main roads too and you want to add more! Thanks.</p> <p>I myself is scared for my own safety growing old now around these araea as your will not listen to people, you will not listen to people, you will not even read this and take it into consideration. When Labour were voted in I listened, to what was said that you wanted to create job, home's ect. But nothing on people feelings. I heard on the radio the other day your building on green belt what have been build on before! What a load of(redacted by admin) excuses my language as these places your building on have never been build on before! Green belt stands for a reason why take it away from us.</p> <p>Any how I a normal person whome, enjoyed playing out around our local area day to day when I was younger Wood Lane, Bignall End and Audley.</p> <p>I've worked since age 14, age 18 driving to work and back, listening to people's concerns from friends and family. Watching the traffic as I go. Going into my 50s soon wanting to stay in this area old and safe. Contributing to this community and countryside when I old and retired.</p> <p>Witch I will not see future generations doing as they are to sacred to go out side in today's world. Please don't take this away from us.</p> <p>If you read this then thank you for listening like I said I just a normal person whome placed my vote, witch was not Labour by the the way as I knew what was coming our way if they got in. Not wrong hey! And I want to have my say!</p> <p>Kind Regards Lisa Owen</p>
<b>Comment ID</b>	NULLP155
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Morning I am a local resident and would like to put my views across, don't know if i have come to the page or not but, I can not express enough how much Newcastle Under Broughy planning to building on houses, warehouses ect this is up setting and unsettling this is for our area! As me my family old generations and new generations have grown up around!</p> <p>2024 and 2025 and the furniture up and coming generations is a scary world to live in today. (Kinfe crime, bullying, break in ect...! )</p> <p>I get that you like to build to bright and beautiful future for people but come on the is a green environment area for people to enjoy! And your taking that all away form us.</p> <p>I am coming into my 50 and I listen to people talk about the younger generations dare not even come out there houses, the young generations moving, schools due to all of the above or even up rooting everything but sad to go (). Has the surroundings Audley, Wood Lane, Bignall end areas all been a safe place to live!</p>

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<b>Comment ID</b>	NULLP152
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Morning I am a local resident and would like to put my views across, don't know if i have come to the page or not but, I can not express enough how much Newcastle Under Broughy planning to building on houses, warehouses ect this is up setting and unsettling this is for our area! As me my family old generations and new generations have grown up around!</p> <p>2024 and 2025 and the furniture up and coming generations is a scary world to live in today. (Kinfe crime, bullying, break in ect...! )</p> <p>I get that you like to build to bright and beautiful future for people but come on the is a green environment area for people to enjoy! And your taking that all away form us.</p> <p>I am coming into my 50 and I listen to people talk about the younger generations dare not even come out there houses, the young generations moving, schools due to all of the above or even up rooting everything but sad to go (). Has the surroundings Audley, Wood Lane, Bignall end areas all been a safe place to live!</p> <p>The roads are compacted with congestion of cars, lorry's especially when the A500 is shut off due to accidents on the locale junctions from 18 right down to 15.</p> <p>We have now double parking no the main road in Bignall End predictions are unfortunately can not get passed on the pavements, parking on the bends an accident waiting to happen. It will only a child or animals to run out, as drives are unable to see around.</p> <p>Our local School have no wear to park their cars they take to the main roads too and you want to add more! Thanks.</p> <p>I myself is scared for my own safety growing old now around these araea as your will not listen to people, you will not listen to people, you will not even read this and take it into consideration. When Labour were voted in I listened, to what was said that you wanted to create job, home's ect. But nothing on people feelings. I heard on the radio the other day your building on green belt what have been build on before! What a load of (redacted by admin) excuses my language as these places your building on have never been build on before! Green belt stands for a reason why take it away from us.</p> <p>Any how I a normal person whome, enjoyed playing out around our local area day to day when I was younger Wood Lane, Bignall End and Audley.</p> <p>I've worked since age 14, age 18 driving to work and back, listening to people's concerns from friends and family. Watching the traffic as I go. Going into my 50s soon wanting to stay in this area old and safe. Contributing to this community and countryside when I old and retired.</p> <p>Witch I will not see future generations doing as they are to sacred to go out side in today's world. Please don't take this away from us.</p> <p>If you read this then thank you for listening like I said I just a normal person whome placed my vote, witch was not Labour by the the way as I knew what was coming our way if they got in. Not wrong hey! And I want to have my say!</p> <p>Kind Regards Lisa Owen</p>

<b>Comment ID</b>	NULLP153
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Morning I am a local resident and would like to put my views across, don't know if i have come to the page or not but, I can not express enough how much Newcastle Under Broughy planning to building on houses, warehouses ect this is up setting and unsettling this is for our area! As me my family old generations and new generations have grown up around!</p> <p>2024 and 2025 and the furniture up and coming generations is a scary world to live in today. (Kinfe crime, bullying, break in ect...! )</p> <p>I get that you like to build to bright and beautiful future for people but come on the is a green environment area for people to enjoy! And your taking that all away form us.</p> <p>I am coming into my 50 and I listen to people talk about the younger generations dare not even come out there houses, the young generations moving, schools due to all of the above or even up rooting everything but sad to go (). Has the surroundings Audley, Wood Lane, Bignall end areas all been a safe place to live!</p> <p>The roads are compacted with congestion of cars, lorry's especially when the A500 is shut off due to accidents on the locale junctions from 18 right down to 15.</p> <p>We have now double parking no the main road in Bignall End predictions are unfortunately can not get passed on the pavements, parking on the bends an accident waiting to happen. It will only a child or animals to run out, as drives are unable to see around.</p> <p>Our local School have no wear to park their cars they take to the main roads too and you want to add more! Thanks.</p> <p>I myself is scared for my own safety growing old now around these araea as your will not listen to people, you will not listen to people, you will not even read this and take it into consideration. When Labour were voted in I listened, to what was said that you wanted to create job, home's ect. But nothing on people feelings. I heard on the radio the other day your building on green belt what have been build on before! What a load of(redacted by admin) excuses my language as these places your building on have never been build on before! Green belt stands for a reason why take it away from us.</p> <p>Any how I a normal person whome, enjoyed playing out around our local area day to day when I was younger Wood Lane, Bignall End and Audley.</p> <p>I've worked since age 14, age 18 driving to work and back, listening to people's concerns from friends and family. Watching the traffic as I go. Going into my 50s soon wanting to stay in this area old and safe. Contributing to this community and countryside when I old and retired.</p> <p>Witch I will not see future generations doing as they are to sacred to go out side in today's world. Please don't take this away from us.</p> <p>If you read this then thank you for listening like I said I just a normal person whome placed my vote, witch was not Labour by the the way as I knew what was coming our way if they got in. Not wrong hey! And I want to have my say!</p> <p>Kind Regards Lisa Owen</p>
<b>Comment ID</b>	NULLP460
<b>Order</b>	90
<b>Title</b>	Policy IN3 Access and Parking
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN3
<b>Q6 Details</b>	<p>Morning I am a local resident and would like to put my views across, don't know if i have come to the page or not but, I can not express enough how much Newcastle Under Broughy planning to building on houses, warehouses ect this is up setting and unsettling this is for our area! As me my family old generations and new generations have grown up around!</p> <p>2024 and 2025 and the furniture up and coming generations is a scary world to live in today. (Kinfe crime, bullying, break in ect...! )</p> <p>I get that you like to build to bright and beautiful future for people but come on the is a green environment area for people to enjoy! And your taking that all away form us.</p> <p>I am coming into my 50 and I listen to people talk about the younger generations dare not even come out there houses, the young generations moving, schools due to all of the above or even up rooting everything but sad to go (). Has the surroundings Audley, Wood Lane, Bignall end areas all been a safe place to live!</p>

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<b>Comment ID</b>	NULLP1341
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Russell
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1400
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Owen
<b>Consultee Given Name</b>	Russell
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP589
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	The Barthomley Action Group
<b>Consultee Position</b>	Chairman
<b>Consultee Family Name</b>	PLATT
<b>Consultee Given Name</b>	DARREN
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Newcastle under Lyme Local Plan – Regulation 19 pre-submission Representations of Barthomley Action Group These are the representations of Barthomley Action Group in respect of the Regulation 19 pre-submission version of the Local Plan.</p> <p>Barthomley Action Group , together with others, have been consistent in their objection to the release of Green Belt land (Strategic Site AB2) adjacent to Junction 16 on the M6 for employment use. The reasons for objection include.</p> <p>The land is statutory Green Belt and not 'grey belt'; and forms a vital part of the Borough's landscape, protecting the character of the Borough and maintaining a distinct separation between urban and rural areas of both the Borough and Cheshire East. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>Many of the local roads are narrow and multi functional - heavily used by walkers, cyclists, and horse riders along with large agricultural vehicles. These roads are becoming increasingly dangerous. A large car driven employment allocation such as that proposed will only exacerbate these issues.</p> <p>It is considered that there is a plentiful supply of Brownfield land more suitably located adjacent to the major settlements in both the plan area and the North Staffs Conurbation for employment purposes. The development will be a major source of light pollution in an otherwise rural landscape.</p> <p>It is quite clear from the plan that the site will be used for warehousing and distribution and will include very large and tall industrial buildings which will be likely to tower over and dominate the surrounding countryside.</p> <p>The allocation of this land for 'employment use' will create an irresistible precedent for the release of other land around this very important and congested motorway junction for similar uses causing further congestion, disruption and loss of Green Belt.</p> <p>Barthomley Action Group object to this allocation and would ask that it is removed from the Plan and that the Council review their employment land strategy looking at the use of brownfield land first within the Borough and retain the Green Belt particularly adjacent to Junction 16.</p> <p>If, however, the strategic site AB2 is agreed to be allocated for employment purposes (in particular logistics) by the Secretary of State, then before any application(s) are submitted the Council prepare a very detailed design /development brief for the site and agree the brief after consultation with all interested parties including all stakeholders, to include ALL the following.</p> <p>A comprehensive sub regional master plan for the whole of the A500 corridor in consultation with all interested stakeholders. This assumes that in the longer term this will become a growth corridor linking Crewe and the North Staffs Conurbation with Junction 16 at its hub. It will also inform future Local Plans including that of Cheshire East and prevent isolated piecemeal developments.</p> <p>Climate and Renewable Energy Policy, include all the matters covered by proposed policy CRE1 including BREEM excellence for water efficiency, whole life carbon assessment and minimise energy use and promote the use of recovery and recycling of materials to reduce carbon.</p> <p>Renewable energy, including a renewable energy statement as set out in Policy CRE2.</p> <p>Design – height, scale, form and grouping of all the proposed buildings on the site; materials and colour; massing of the development, green infrastructure and relationship to the wider area including views into and out of the site from the surrounding countryside. (proposed policy PSD7 Design). External lighting should also be considered as part of the overall design as logistic operations are 24-hour operations and lighting of a site as large as AB2 will have a significant impact on the motorway and the surrounding rural area.</p> <p>Access by sustainable modes of transport to protect the integrity of the highway network which will be particularly important at this site (AB2) as it is some way away from the centres of population, access will be difficult and currently no public transport runs past the site - Policy IN2</p> <p>Whilst there is a proposed policy for the site (AB2) in the draft plan, Barthomley Action Group would like to see this incorporated within a detailed design / development brief included as a policy in any adopted plan to ensure that, should the development go ahead the proposals will not adversely impact on the surrounding area and on Barthomley Parish in particular.</p> <p>A500 Jct16- adding heavy commercial and car vehicle numbers in this area which even of a weekend gets congested now will degrade the attractiveness of industrial areas along the A500 Corridor towards Newcastle under Lyme and Stoke on Trent, possibly making them to move to more accessible locations out of the borough. Without major infrastructure investment if AB2 were to go ahead with its limited outlined design it would be detrimental to North Staffordshire businesses which use the A500 Jct16 to excess the M6 North and the A500 into Wales.</p>



	as available. This leaves 18.9 hectares to identify. As such, you already have proposed alternative sites that will give you this area and still allow mixed use of the sites. There is therefore no justification to destroy 78 hectares of prime agricultural land, well above the required amount in the plan on its own, and substantially alter the character of Audley village in the process.
<b>Comment ID</b>	NULLP778
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	In response to the Local Plan consultation, we would like to object to the parts pertaining to Audley & Bignall End. Building around 250 extra houses in the area will considerably change the nature and character of the village, going against particularly SOIV, to reduce the carbon footprint, promote sustainability and harness opportunities for carbon sequestration. It also goes against SOVI, to promote and sustain villages and their character. The road infrastructure will not cope with the increase in traffic that this will bring. In many places along the routes in & through the village the houses open directly onto the road with no off-road parking. This results in parked vehicles restricting the carriageways and causing congestion. This will be made worse with the increase in cars that the extra housing will bring. There is no mention in the plan of any provision for healthcare or schools for the increased population. The medical practice in Audley is already at capacity and increasing the population will put increased strain on the health services and risk diminution of care to the existing patients of the practice. The current proposals also go against the direction of travel for government policy with the need to keep most development within urban areas as far as possible, with optimisation of densification of properties to make best use of public transport and greener travel. Green belt land should be protected. The National Planning Policy Framework 2021 already indicates the need to protect green belt land and that rural development should support local services, not overwhelm them.
<b>Comment ID</b>	NULLP780
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	In response to the Local Plan consultation, we would like to object to the parts pertaining to Audley & Bignall End. Building around 250 extra houses in the area will considerably change the nature and character of the village, going against particularly SOIV, to reduce the carbon footprint, promote sustainability and harness opportunities for carbon sequestration. It also goes against SOVI, to promote and sustain villages and their character. The road infrastructure will not cope with the increase in traffic that this will bring. In many places along the routes in & through the village the houses open directly onto the road with no off-road parking. This results in parked vehicles restricting the carriageways and causing congestion. This will be made worse with the increase in cars that the extra housing will bring. There is no mention in the plan of any provision for healthcare or schools for the increased population. The medical practice in Audley is already at capacity and increasing the population will put increased strain on the health services and risk diminution of care to the existing patients of the practice. The current proposals also go against the direction of travel for government policy with the need to keep most development within urban areas as far as possible, with optimisation of densification of properties to make best use of public transport and greener travel. Green belt land should be protected. The National Planning Policy Framework 2021 already indicates the need to protect green belt land and that rural development should support local services, not overwhelm them.
<b>Comment ID</b>	NULLP779
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	In response to the Local Plan consultation, we would like to object to the parts pertaining to Audley & Bignall End. Building around 250 extra houses in the area will considerably change the nature and character of the village, going against particularly SOIV, to reduce the carbon footprint, promote sustainability and harness opportunities for carbon sequestration. It also goes against SOVI, to promote

and sustain villages and their character. The road infrastructure will not cope with the increase in traffic that this will bring. In many places along the routes in & through the village the houses open directly onto the road with no off-road parking. This results in parked vehicles restricting the carriageways and causing congestion. This will be made worse with the increase in cars that the extra housing will bring. There is no mention in the plan of any provision for healthcare or schools for the increased population. The medical practice in Audley is already at capacity and increasing the population will put increased strain on the health services and risk diminution of care to the existing patients of the practice. The current proposals also go against the direction of travel for government policy with the need to keep most development within urban areas as far as possible, with optimisation of densification of properties to make best use of public transport and greener travel. Green belt land should be protected. The National Planning Policy Framework 2021 already indicates the need to protect green belt land and that rural development should support local services, not overwhelm them.





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<b>Comment ID</b>	NULLP777
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	In response to the Local Plan consultation, we would like to object to the parts pertaining to Audley & Bignall End. Building around 250 extra houses in the area will considerably change the nature and character of the village, going against particularly SOIV, to reduce the carbon footprint, promote sustainability and harness opportunities for carbon sequestration. It also goes against SOVI, to promote and sustain villages and their character. The road infrastructure will not cope with the increase in traffic that this will bring. In many places along the routes in & through the village the houses open directly onto the road with no off-road parking. This results in parked vehicles restricting the carriageways and causing congestion. This will be made worse with the increase in cars that the extra housing will bring. There is no mention in the plan of any provision for healthcare or schools for the increased population. The medical practice in Audley is already at capacity and increasing the population will put increased strain on the health services and risk diminution of care to the existing patients of the practice. The current proposals also go against the direction of travel for government policy with the need to keep most development within urban areas as far as possible, with optimisation of densification of properties to make best use of public transport and greener travel. Green belt land should be protected. The National Planning Policy Framework 2021 already indicates the need to protect green belt land and that rural development should support local services, not overwhelm them.
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<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
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<b>Comment ID</b>	NULLP775
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Page
<b>Consultee Given Name</b>	Richard
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	In response to the Local Plan consultation, we would like to object to the parts pertaining to Audley & Bignall End. Building around 250 extra houses in the area will considerably change the nature and character of the village, going against particularly SOIV, to reduce the carbon footprint, promote sustainability and harness opportunities for carbon sequestration. It also goes against SOVI, to promote and sustain villages and their character. The road infrastructure will not cope with the increase in traffic

that this will bring. In many places along the routes in & through the village the houses open directly onto the road with no off-road parking. This results in parked vehicles restricting the carriageways and causing congestion. This will be made worse with the increase in cars that the extra housing will bring. There is no mention in the plan of any provision for healthcare or schools for the increased population. The medical practice in Audley is already at capacity and increasing the population will put increased strain on the health services and risk diminution of care to the existing patients of the practice. The current proposals also go against the direction of travel for government policy with the need to keep most development within urban areas as far as possible, with optimisation of densification of properties to make best use of public transport and greener travel. Green belt land should be protected. The National Planning Policy Framework 2021 already indicates the need to protect green belt land and that rural development should support local services, not overwhelm them.

<b>Comment ID</b>	NULLP674
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Palmer
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>I am writing to you with regard to the final draft local plan in particular the proposed development at site BL18. I feel that due diligence has not been followed, and the required investigations have not been taken before putting this site forward, the reasons for my concerns are listed below.</p> <ol style="list-style-type: none"> <li>1 I do not believe that you have fully considered the impact on wildlife, this land is home to at least eight protected species some of which also have their habitat protected.</li> <li>2 I am also unsure that a study of the Flora has been undertaken. This land is home to several protected trees and is also known to have issues with Japanese knotweed which would require extensive work to be undertaken in order to eradicate it before building were to commence. To sell this land for development without disclosing this fact would be complete dereliction of the council's duty. This could also result in any properties becoming unsalable as people would be unable to obtain mortgages.</li> <li>3 I believe that the site is unsuitable for building as it is home to several fresh water springs and as a result becomes extremely waterlogged. There is already a network of large land drains in place but despite this several houses along Beech Drive still suffer from flooding issues. I Recently (redacted by admin) and this Required piling to be carried out, the land on the proposed site in as bad a state if not worse than mine.</li> <li>4 Privacy issues already exist for residents of Beech Drive as even when walking along the lower reaches of the site people can look down into their bedrooms, this problem will be severely exacerbated if houses were to be built on this land, due to the increased number of people and this could be abused by certain people spying from the privacy of their own homes.</li> <li>5 I believe that the impact of the additional traffic that would be created by this development on already congested roads has not received sufficient consideration and that your proposed alteration at Talke traffic lights are totally inadequate as they will only provide benefits for traffic traveling in a northerly direction, and traffic travelling in a southerly direction is regularly congested to the point where it can easily take up to twenty minutes (in some cases more) to travel from Talke traffic lights to Talke roundabout, especially when there is an accident on the M6. I also believe that wherever the site access is provided it will create major problems.</li> <li>6 I believe that the increase in the population in this area will also lead to further increases in crime, the rate of which has increased considerably in recent years and the police are making no impact on this. Only three weeks ago there was a drugs raid in Sycamore Close, where a young person was arrested and machetes and knives were taken. He was released on bail and is now dealing again.</li> <li>7 I also believe that insufficient consideration has been given to other services given the total all the proposed developments in the Kidsgrove, Butt Lane and Talke area for example Schools, nurseries doctors, dentists, Ambulance Service, and Fire Service. It is already virtually impossible for people to find an NHS dentist in the area.</li> <li>8 The development of this site could take away the only local facility where dog owners could exercise their dogs without having to keep them on a lead, as it is forbidden for dogs to be off the lead in both Clough Hall Park and Bath Pool Park.</li> <li>9 For all the above reasons I believe that you have selected the wrong site for this development and that a far better site would be where the Arnold Clarke storage facility is, situated adjacent to the A34 to the south of West Avenue and this would connect with the recent development on the old GEC car parks, This would be making good use of a brown field site instead of it just being used to store cars without providing any jobs</li> </ol> <p>Finally I would be grateful to receive any comments you may have regarding the above and would also like to be notified of any opportunity to meet with or attend any meetings with the government inspectors when they are reviewing the plan</p>

<b>Comment ID</b>	NULLP190
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Palmer
<b>Consultee Given Name</b>	Kevin
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>In addition to all outlined in this objection I just want to emphasise the main points of living in an area classed as semi-rural.</b></p> <p><b>Regardless of reducing the original plan of 778 homes to 530 the infrastructure simply isn't there to support them. Red Street village struggles to cope with the existing population as it is with its lack of facilities and while the plan outlines a community hub (which I believe is retail based) it's an additional Surgery/Practice and NHS Dentist that we need and not more fast food, barbers and convenience stores.</b></p> <p><b>Nature conservation also plays a big part in this area which supports an abundance of wildlife, mature trees and hedgerows which I fear will all disappear should this development go ahead. With all these points along with all the excellent points raised in the document I feel strongly CT1 should not go forward for planning.</b></p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP231
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Palmer
<b>Consultee Given Name</b>	Kevin
<b>Q5 DTC compliant</b>	No



<p><b>Q6 Details</b></p>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
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<b>Comment ID</b>	NULLP66
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Parish Council
<b>Consultee Given Name</b>	Weston and Crewe Green
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>These are the representations of Weston &amp; Crewe Green parish Council in respect of the Regulation 19 pre-submission version of the Local Plan. The boundary of Weston &amp; Crewe Green Parish abuts that of Newcastle Borough.</p> <p>The Parish Council, together with others, have been consistent in their objection to the release of Green Belt land (Strategic Site AB2) adjacent to Junction 16 on the M6 for employment use.</p> <p>The reasons for objection include.</p> <p>The land is statutory Green Belt and not 'grey belt'; and forms a vital part of the Borough's landscape, protecting the character of the Borough and maintaining a distinct separation between urban and rural areas of both the Borough and Cheshire East. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>The land is currently in agricultural use.</p> <p>The development will generate significant levels of traffic movement both of HGV's and cars around Junction 16 of the M6 which is already extremely busy and often congested. The proposed allocation will generate additional queues and delays around and through this junction which is a gateway to the Northwest, Cheshire East and Weston &amp; Crewe Green Parish.</p> <p>The site could severely impact, dependent on design, the movement and traffic flows on the A500 and the first junction to the east of the motorway (Audley) along with the surrounding minor roads, where presumably all traffic coming to the site from the motorway will need to negotiate to join the west bound carriageway of the A 500 to enter the proposed site.</p> <p>The current congestion problems on the M6, which are of increasing concern to our Parish, have resulted in increased 'rat running' through our local area on the narrow country lanes to the extreme detriment of the amenities and quality of life of our residents. Many of the local roads are narrow and multi-functional - heavily used by walkers, cyclists, and horse riders along with large agricultural vehicles. These roads are becoming increasingly dangerous. A large car driven employment allocation such as that proposed will only exacerbate these issues.</p> <p>It is considered that there is a plentiful supply of Brownfield land more suitably located adjacent to the major settlements in both the plan area and the North Staffs Conurbation for employment purposes. The development will be a major source of light pollution in an otherwise rural landscape.</p> <p>It is quite clear from the plan that the site will be used for warehousing and distribution and will include very large and tall industrial buildings which will be likely to tower over and dominate the surrounding countryside.</p> <p>The allocation of this land for 'employment use' will create an irresistible precedent for the release of other land around this very important and congested motorway junction for similar uses causing further congestion, disruption and loss of Green Belt.</p> <p>Weston &amp; Crewe Green Parish Council object to this allocation and would ask that it is removed from the Plan and that the Council review their employment land strategy looking at the use of brownfield land first within the Borough and retain the Green Belt particularly adjacent to Junction 16.</p> <p>If, however, the strategic site AB2 is agreed to be allocated for employment purposes (in particular logistics) by the Secretary of State, then before any application(s) are submitted the Council prepare a very detailed design /development brief for the site and agree the brief after consultation with all interested parties including all stakeholders, to include ALL the following.</p> <p>A comprehensive sub regional master plan for the whole of the A500 corridor in consultation with all interested stakeholders. This assumes that in the longer term this will become a growth corridor linking Crewe and the North Staffs Conurbation with Junction 16 at its hub. It will also inform future Local Plans including that of Cheshire East and prevent isolated piecemeal developments.</p> <p>Design – height, scale, form and grouping of all the proposed buildings on the site; materials and colour; massing of the development, green infrastructure and relationship to the wider area including views into and out of the site from the surrounding countryside. (proposed policy PSD7 Design). External lighting should also be considered as part of the overall design as logistic operations are 24-hour operations and lighting of a site as large as AB2 will have a significant impact on the motorway and the surrounding rural area.</p> <p>Climate and Renewable Energy Policy, include all the matters covered by proposed policy CRE1 including BREEM excellence for water efficiency, whole life carbon assessment and minimise energy use and promote the use of recovery and recycling of materials to reduce carbon.</p> <p>Renewable energy, including a renewable energy statement as set out in Policy CRE2.</p> <p>Access by sustainable modes of transport to protect the integrity of the highway network which will be particularly important at this site (AB2) as it is some way away from the centres of population, access will be difficult and currently no public transport runs past the site - Policy IN2</p> <p>Whilst there is a proposed policy for the site (AB2) in the draft plan, the Council would like to see this incorporated within a detailed design / development brief included as a policy in any adopted plan to ensure that, should the development go ahead the proposals will not adversely impact on the surrounding area and on Weston &amp; Crewe Green Parish in particular.</p>

<b>Comment ID</b>	NULLP76
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Parr
<b>Consultee Given Name</b>	Janice
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>To Whom It May Concern,</p> <p>I am writing to put forward my comments regarding the Newcastle-under-Lyme Local Plan 2020-2040 Draft Local Plan (Regulation 19 stage) as follows:-</p> <p>Here in Loggerheads we have absolutely no infrastructure to support further building sites. We have in recent months had various different building companies creating new homes, some of which are struggling to sell. We have one site built as rental properties which appear to still be mostly empty.</p> <p>We have no decent public transport, mostly it consists of a less than decent bus service, going either way from Hanley to Shrewsbury and various stops in between. Only running every two hours. Therefore families would be dependant on their own mode of transport causing even more pressure on the already busy A53, which is the main link to and from the M6 motorway.</p> <p>LW53 would most certainly create problems for Muckleston Wood Lane and the exit out on to the A53 is an accident waiting to happen now, let alone with 900 extra vehicles trying to access it. (Given that most of the 450 dwelling would likely have two or more vehicles per property). It is a greenfield site and has a grade II listed building on it.</p> <p>Loggerheads has one small co-op, a post office situated within the chemist and limited other facilities. The nearest gp surgery is in Ashley, which is not easily accessible to those without their own transport. There is no dentist.</p> <p>There is only one infant school at Muckleston and one infant/junior school actually in Loggerheads. There are no leisure amenities whatsoever.</p> <p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy.</li> <li>2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under utilised urban sites.</li> <li>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for recognised that the proposed development of the site for housing would result in harm to the setting of the Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023).</li> <li>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023).</li> <li>5. Policy PSD3: Distribution of Development (page 16) No figures or evidence have been provided to justify why it is necessary for Loggerheads to expand by 450 dwellings.</li> <li>6. Conclusion</li> <li>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for other reasons (above) is contrary to the NPPF 2023.</li> <li>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</li> </ol>
<b>Q7 Modification</b>	<p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP74

<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Parr
<b>Consultee Given Name</b>	Janice
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>To Whom It May Concern,</p> <p>I am writing to put forward my comments regarding the Newcastle-under-Lyme Local Plan 2020-2040 Draft Local Plan (Regulation 19 stage) as follows:-</p> <p>Here in Loggerheads we have absolutely no infrastructure to support further building sites. We have in recent months had various different building companies creating new homes, some of which are struggling to sell. We have one site built as rental properties which appear to still be mostly empty.</p> <p>We have no decent public transport, mostly it consists of a less than decent bus service, going either way from Hanley to Shrewsbury and various stops in between. Only running every two hours. Therefore families would be dependant on their own mode of transport causing even more pressure on the already busy A53, which is the main link to and from the M6 motorway.</p> <p>LW53 would most certainly create problems for Mucklestone Wood Lane and the exit out on to the A53 is an accident waiting to happen now, let alone with 900 extra vehicles trying to access it. (Given that most of the 450 dwelling would likely have two or more vehicles per property). It is a greenfield site and has a grade II listed building on it.</p> <p>Loggerheads has one small co-op, a post office situated within the chemist and limited other facilities. The nearest gp surgery is in Ashley, which is not easily accessible to those without their own transport. There is no dentist.</p> <p>There is only one infant school at Mucklestone and one infant/junior school actually in Loggerheads. There are no leisure amenities whatsoever.</p> <p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy.</li> <li>2. (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under utilised urban sites.</li> <li>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for recognised that the proposed development of the site for housing would result in harm to the setting of the Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023).</li> <li>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023).</li> <li>5. Policy PSD3: Distribution of Development (page 16) No figures or evidence have been provided to justify why it is necessary for Loggerheads to expand by 450 dwellings.</li> <li>6. Conclusion</li> <li>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for other reasons (above) is contrary to the NPPF 2023.</li> <li>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</li> </ol>
<b>Q7 Modification</b>	<p>6. Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>

<b>Comment ID</b>	NULLP799
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Paterson
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I have frequented The Rigger for over 30 years &amp; in that time have made life long friendships, &amp; for over 25 years, been luck enough (redacted by admin). It not only acts as a meeting point for social interaction, it plays host to the next generation of talent breaking into the larger music/performance scene of the UK. Without venues like the Rigger, the rising performers simply would not be discovered &amp; have that stepping stone onto the next level of their career within the national network of essential venues.</p> <p>As a local resident, performer &amp; visitor of The Rigger, I know firsthand how vital this venue is to the community. Losing it due to increased noise complaints would have a devastating impact on (redacted by admin), the local economy &amp; the town's cultural scene. The Rigger is not only a venue for live music - it serves as a gathering place, a platform for local talent, and a key contributor to Newcastle-under-Lyme's identity as a cultural hub.</p> <p>I urge the planning team to include stronger noise mitigation measures that specifically protect The Rigger. Including specifically mentioning the venues cultural significance and the inclusion of the Agent of Change principle in the 'Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses' under Policy TC22 ensuring that the responsibility for mitigating potential noise issues falls on the developers rather than existing businesses and culturally significant venues. Without these changes, The Rigger could face unfair restrictions due to increased noise complaints that would limit its ability to operate and serve the community.</p> <p>Thank you for considering my concerns. I hope the planning team will take the necessary steps to safeguard The Rigger and ensure that it continues to thrive as a vital part of our town's cultural landscape.</p>

<b>Comment ID</b>	NULLP1488
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Paxton-Moore
<b>Consultee Given Name</b>	Denise
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1489
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Paxton-Moore
<b>Consultee Given Name</b>	Denise
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>



of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1490
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Paxton-Moore
<b>Consultee Given Name</b>	Steve
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1487
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Paxton-Moore
<b>Consultee Given Name</b>	Steve
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this</p>

	<p>fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP136
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Payne
<b>Consultee Given Name</b>	Deborah
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP137
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Payne
<b>Consultee Given Name</b>	Deborah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP121
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Pedley
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>Hi,</p> <p>We would like to make clear that we are strongly against ALL the proposed developments in Audley parish due to the following.</p> <ol style="list-style-type: none"> <li>1, Increased pressure on ALL local services such as doctors</li> <li>2, Increased air pollution</li> <li>3, Increased traffic on ALL local roads including our narrow, no pavement, access only road which already gets 10, 000 vehicles per month.</li> <li>4, Loss of habitat for wildlife</li> <li>5, Loss of village identities</li> <li>6, Loss of farming land</li> <li>7, Increased road accidents</li> <li>8, General significant loss of quality of life for residents</li> </ol> <p>These are the reasons that immediately spring to mind but there will be a whole host of others.</p> <p>We would just like to add that your online portal is far too complicated and long winded for the average person making the whole process nondemocratic!</p> <p>Kind regards,</p> <p>Mr and Mrs Pedley (Redacted by admin)</p>
<b>Comment ID</b>	NULLP118
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Pedley
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Hi,</p> <p>We would like to make clear that we are strongly against ALL the proposed developments in Audley parish due to the following.</p> <ol style="list-style-type: none"> <li>1, Increased pressure on ALL local services such as doctors</li> <li>2, Increased air pollution</li> <li>3, Increased traffic on ALL local roads including our narrow, no pavement, access only road which already gets 10, 000 vehicles per month.</li> <li>4, Loss of habitat for wildlife</li> <li>5, Loss of village identities</li> <li>6, Loss of farming land</li> <li>7, Increased road accidents</li> <li>8, General significant loss of quality of life for residents</li> </ol> <p>These are the reasons that immediately spring to mind but there will be a whole host of others.</p> <p>We would just like to add that your online portal is far too complicated and long winded for the average person making the whole process nondemocratic!</p> <p>Kind regards,</p> <p>Mr and Mrs Pedley (Redacted by admin)</p>
<b>Comment ID</b>	NULLP122
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Pedley
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	<p>We would just like to add that your online portal is far too complicated and long winded for the average person making the whole process nondemocratic!</p>

<b>Comment ID</b>	NULLP119
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Pedley
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Hi,</p> <p>We would like to make clear that we are strongly against ALL the proposed developments in Audley parish due to the following.</p> <ol style="list-style-type: none"> <li>1, Increased pressure on ALL local services such as doctors</li> <li>2, Increased air pollution</li> <li>3, Increased traffic on ALL local roads including our narrow, no pavement, access only road which already gets 10, 000 vehicles per month.</li> <li>4, Loss of habitat for wildlife</li> <li>5, Loss of village identities</li> <li>6, Loss of farming land</li> <li>7, Increased road accidents</li> <li>8, General significant loss of quality of life for residents</li> </ol> <p>These are the reasons that immediately spring to mind but there will be a whole host of others.</p> <p>We would just like to add that your online portal is far too complicated and long winded for the average person making the whole process nondemocratic!</p> <p>Kind regards,</p> <p>Mr and Mrs Pedley (Redacted by admin)</p>
<b>Comment ID</b>	NULLP120
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Pedley
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Hi,</p> <p>We would like to make clear that we are strongly against ALL the proposed developments in Audley parish due to the following.</p> <ol style="list-style-type: none"> <li>1, Increased pressure on ALL local services such as doctors</li> <li>2, Increased air pollution</li> <li>3, Increased traffic on ALL local roads including our narrow, no pavement, access only road which already gets 10, 000 vehicles per month.</li> <li>4, Loss of habitat for wildlife</li> <li>5, Loss of village identities</li> <li>6, Loss of farming land</li> <li>7, Increased road accidents</li> <li>8, General significant loss of quality of life for residents</li> </ol> <p>These are the reasons that immediately spring to mind but there will be a whole host of others.</p> <p>We would just like to add that your online portal is far too complicated and long winded for the average person making the whole process nondemocratic!</p> <p>Kind regards,</p> <p>Mr and Mrs Pedley (Redacted by admin)</p>

<b>Comment ID</b>	NULLP1463
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Pegg
<b>Consultee Given Name</b>	Antony
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>

	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>As of 2024 (and as a resident of 86 years) I have seen 4 large estates that have been built, ie Original Crackley Estate Waterhayes Estate Mitchells Wood Estate and Shutt Lane Deans Lane Estate + 3 built on Farm Land.</p> <p>As a result, traffic through Red Street has increased enormously. Surely some agricultural land should be left for crops. Quality of life has been degraded. Already we have sprawl to Chesterton and with this plan there will be spread to Talke contravening Green Belt.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1457
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Pegg
<b>Consultee Given Name</b>	Antony
<b>Q6 Details</b>	<b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b> <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>



When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1455
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Pegg
<b>Consultee Given Name</b>	Dorothy
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1458
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Pegg
<b>Consultee Given Name</b>	Dorothy
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>As of 2024 (and as a resident of 86 years) I have seen 4 large estates that have been built, ie  Original Crackley Estate  Waterhayes Estate  Mitchells Wood Estate and Shutt Lane  Deans Lane Estate  + 3 built on Farm Land.</p> <p>As a result, traffic through Red Street has increased enormously. Surely some agricultural land should be left for crops. Quality of life has been degraded. Already we have sprawl to Chesterton and with this plan there will be spread to Talke contravening Green Belt.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1215
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Phillips
<b>Consultee Given Name</b>	Janet
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<ul style="list-style-type: none"> <li>- AB2 not realistic as Junc 16 of M6 /A500 is inadequate with many current problems (see 4-5 Accident Data analysis)</li> <li>- Proposed to remove 80 hectares of good quality agricultural land/Greenbelt for 22 hectares of employment land with, as yet, unspecified use &amp; jobs not predictable employment figures &amp; uncertainty re source of workforce &amp; whether applicable to local plan requirement for employment in area.</li> <li>- Emergency access proposals totally unfeasible (Barthomley Road) - as mainly one track lanes &amp; would require a site visit to appreciate the impossibility of this suggestion.</li> <li>- Provision of lorry park &amp; associated facilities to replace a short layby on A500 is unnecessary &amp; intrusive as other truck stops are in close proximity ie Crewe 7-8 miles with 365/24 hour service, ADS truckstop, Longton 12-2 miles &amp; Lymm 29-4 miles.</li> <li>- AB2 surplus to requirements as many units on neighbouring sites have vacant units including 8 advertised at present time at Radway Green &amp; many vacant for some time (? Discussions &amp; research into neighbouring authorities &amp; provides? )</li> <li>- Sustainable Travel requirements not met as no direct access to site &amp; no long term plan for future transport. Huge traffic impact on surrounding area (See 4-5)</li> </ul>
<b>Q7 Modification</b>	Remove AB2 from plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1260
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Phillips
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>-AB2 not realistic as Junc 16 of M6/A500 is inadequate with many current problems (see 4-5 Accident Dark Analysis)</p> <p>- Proposed to remove 80 hectares of good quality agricultural land / green belt for 22 hectares of employment land with, as yet, unspecified use, jobs, impossible to be accurate in predicting employment figures arising from development a, uncertainty re source of workforce, whether applicable to local plan requirement for employment in the area. Also query evidence base for employment requirements &amp; figures in locality.</p> <p>- Emergency access proposals totally unfeasible (Barthomley Road) as mainly one track lane, no pavements, a would require a site visit to appreciate the impossibility of this suggestion.</p> <p>- Provision of lorry park and associated facilities to replace a short layby on A500, is unnecessary &amp; intrusive as other truck shops are available &amp; in close proximity ie Crewe 7-8 miles with 365/24 hour provision, ADS Truckstop, Longton 12-2 miles &amp; Lymm 29-4miles.</p> <p>- AB2 surplus to 'local' requirements as many vacant units available in area including 8 advertised at the present time at Radway Green. Many vacant units have been available for some time/ (? Discussion &amp; research into neighbouring providers)</p> <p>- Sustainable Travel requirements are not met as no direct access to site &amp; no long term plan for future transport. Huge traffic impact on surrounding area (see 4-5)</p>
<b>Q7 Modification</b>	Remove AB2 from Local Plan
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Long term local resident & knowledge of infrastructure requirements



<b>Comment ID</b>	NULLP64
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Phoenix
<b>Consultee Given Name</b>	Elizabeth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I have just been informed of the site allocations in Silverdale and a number of them are a cause for concern in regards to the environment of the village.</p> <p>Sites SP11 (1, 2, 3, and 4) and SP23 would all take away from a large area land that the public can use and which is fundamental for local wildlife to thrive. Kestrels are known to nest in the trees in the areas you are proposing to build on as well as species of bat.</p> <p>The proposed access points to SP11 (3), SP11 (4), and SP23 would result in considerable disruption during construction and traffic build-up once completed.</p> <p>Furthermore, would any prospective residents of these properties be made aware of the ongoing environmental issues regarding Walleys Quarry before they moved in? Beyond that, what controls are being put in place to ensure people can buy these houses for homes rather than being bought and rented out only for personal gain?</p> <p>Rather than destroying well-loved green spaces around the village, which is the main draw for new residents, a thorough scheme of renovation and rent and landlord controls would be more important to ensure that those who love the village can stay in the village.</p> <p>I trust these issues will be brought before the public in a way the whole village can have a say.</p>
<b>Comment ID</b>	NULLP65
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Phoenix
<b>Consultee Given Name</b>	Elizabeth
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I have just been informed of the site allocations in Silverdale and a number of them are a cause for concern in regards to the environment of the village.</p> <p>Sites SP11 (1, 2, 3, and 4) and SP23 would all take away from a large area land that the public can use and which is fundamental for local wildlife to thrive. Kestrels are known to nest in the trees in the areas you are proposing to build on as well as species of bat.</p> <p>The proposed access points to SP11 (3), SP11 (4), and SP23 would result in considerable disruption during construction and traffic build-up once completed.</p> <p>Furthermore, would any prospective residents of these properties be made aware of the ongoing environmental issues regarding Walleys Quarry before they moved in? Beyond that, what controls are being put in place to ensure people can buy these houses for homes rather than being bought and rented out only for personal gain?</p> <p>Rather than destroying well-loved green spaces around the village, which is the main draw for new residents, a thorough scheme of renovation and rent and landlord controls would be more important to ensure that those who love the village can stay in the village.</p> <p>I trust these issues will be brought before the public in a way the whole village can have a say.</p>

<b>Comment ID</b>	NULLP1064
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE4
<b>Q6 Details</b>	<p>Please see attached representations. Draft Policy SE4 seeks to require all developments to adhere to sustainable drainage systems. Criteria 1 states that "Smaller developments may be exempt from full Sustainable Drainage Systems (SuDs) implementation...". It is not clear what is meant by 'smaller' developments. We request that the Council defines what is meant by 'smaller' developments in either the policy or explanatory text. It may be appropriate to reword the policy to refer to minor sites, in line with the NPPF.</p> <p>It is not clear what the viability implications may be as a result of requiring all developments to incorporate SuDS. Has this been considered by the Council and has any viability testing undertaken?</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1068
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. The WMHAPC is pleased to see draft Policy PSD1 commit to delivering a minimum of 8,000 new dwellings in Newcastle-under-Lyme within the Plan period, based on the current standard method. We welcome the Council's revised housing requirement figure of 400 dwellings per annum (dpa), an increase on the previously proposed 358 dpa. This increase will help to accommodate growth and ambitious housing delivery where necessary to meet identified needs.</p> <p>The SWHAPC draws attention to the recent National Planning Policy Framework (NPPF) consultation. In respect of the proposed transitional arrangements, where a Local Plan has reached Regulation 19 stage, the annual housing requirement in the plan will be compared against the updated LHN for the authority area. Where the emerging annual housing requirement is within 200 dpa (or exceeds) the updated LHN, the plan may progress to Examination under the NPPF that is currently applicable to the plan. The updated LHN for Newcastle-Under-Lyme under the newly proposed Standard Method is 593 dpa. Given the Council has revised its proposed housing requirement to an increased figure of 400 dpa, the emerging plan's housing requirement is within the 200 dwelling requirement, and so it should be able to progress under the current NPPF.</p> <p>The Housing and Economic Development Needs Assessment (HEDNA) (April 2024) identifies an annual need for 278 affordable homes per annum in the Borough over the Plan period. This affordable housing needs figure represents 70% of the total proposed housing requirement. While down from the previous 78% of total housing needs under the 358 dpa figure, it remains a substantial proportion. The WMHAPC therefore encourages the Council to look for ways to facilitate the delivery of affordable housing in order to maximise provision across the Borough.</p>

	We emphasise the importance of joint working between Newcastle-under-Lyme and Stoke-on-Trent in order to maximise the delivery of affordable housing for those in need across the region.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1072
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	<p>Please see attached representations. Criteria 4 of draft policy PSD7 states that “Development proposals for major development schemes should demonstrate that design proposals have positively responded to the Design Review process”.</p> <p>While the WMHAPC acknowledges the value of engaging with stakeholders on design, the requirement for all proposals of 10 or more dwellings to engage in a design review process appears overly stringent. There is concern that the policy, as currently worded, could delay the progression of smaller major sites and will add to viability considerations if there is to be a cost for the applicant to engage in the design review process.</p> <p>The WMHAPC suggests that design reviews should be reserved for larger major schemes, specifically developments proposing 50 or more residential units or strategic sites which present more complex issues. This approach would ensure a well-coordinated design while streamlining the process for smaller major developments. We therefore recommend including an exemption for smaller developments in the policy to enable such schemes to progress without delay.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1076
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU6
<b>Q6 Details</b>	<p>Please see attached representations. The supporting text to draft Policy HOU6 at paragraph 7.49 states that: “If designated self / custom build plots remain unsold after the one-year marketing period, the Council may consider alternative approaches. Options may include: ... Offering the plots as affordable housing: Working with registered providers or community-led housing organisations to develop the plots as affordable housing for local residents.” The WMHAPC supports this approach from the Council as it could allow for the self-build homes to be freed up for the affordable housing market if such homes remain unsold and would in turn increase the supply of affordable homes.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations

<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1080
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p>Please see attached representations. The WMHAPC welcomes the Council's support for developments which will help to deliver the necessary infrastructure to communities. However, as currently worded, the policy does not take into account the viability aspect of 100% affordable housing schemes. As such, the WMHAPC urges the Council to include an appropriate caveat that planning decision makers will need to consider the financial viability against the requirement of "incorporating new infrastructure on-site". The WMHAPC recommends that the level of financial contribution towards the provision of infrastructure should be exempt or reduced in order to practically deliver the affordable homes without compromising on viability.</p> <p>The Council should explore joint approaches and alternative funding mechanisms such as S106 agreements of neighbouring developments to aid in the improvement and development of new infrastructure of 100% affordable housing projects.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1062
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Please see attached representations. Criteria 3 of Draft Policy CRE1 references water efficiency measures of 110 litres per person per day in line with Part G of the Building Regulations for new developments. The WMHAPC suggests revising this requirement to focus on complying with the most up to date building regulations instead of specifying exact measures. This is because water efficiency standards are already addressed and enforced through Building Regulations, and planning policies should avoid replicating these standards to prevent becoming outdated due to potential changes in building regulations. Criteria 4 of Draft Policy CRE1 indicates that proposals which exceed fabric and energy efficient performance will be afforded positive weight. This is supported by the WMHAPC.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1074
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density

<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	<p>Please see attached representations. The WMHAPC welcomes the Council's approach at criteria 3 of draft Policy HOU2, signposting readers to the most up to date evidence including the HEDNA and Housing Needs Assessments (HNA) to understand what housing mix may be appropriate.</p> <p>Supporting text at paragraph 7.20 acknowledges that various sources aside from the Council's own housing needs assessment can be considered to inform the housing mix of residential developments. Specifically, it states that: "local housing needs surveys, Neighbourhood Plans, Parish Surveys, Parish Plans and the latest Council Position Statements. The housing mix for affordable housing will be informed by the housing register and other relevant considerations including the demand for letting, management issues and affordability." The WMHAPC is pleased that the previously rigid housing mix policy set out in the previous round of consultation has been revised to broaden the evidence base. This more flexible approach recognises that housing needs are dynamic and are influenced by site location, geographical context and local socioeconomic factors.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1078
<b>Order</b>	58
<b>Title</b>	Policy HOU8: Rural and First Homes Exception Sites
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU8
<b>Q6 Details</b>	<p>Please see attached representations. It is positive to see that the Council has now introduced a standalone policy for rural exception sites. The delivery of rural housing in sustainable locations is critical in sustaining rural communities.</p> <p>With regards to the delivery of First Homes, some of the WMHAPC members have raised concerns over its effectiveness of as a route to deliver affordable housing. While First Homes may benefit first-time buyers, its contribution to affordable housing delivery remains uncertain. However, we acknowledge the importance of exception site policies in addressing local housing shortages, particularly in areas with limited development opportunities.</p> <p>It can be seen that draft Policy HOU9 requires at criteria C that: "The scale and location of the site relates well to the existing settlement and landscape character, with a site not exceeding a maximum of 1 hectare or 5% of the size of the existing settlement, whichever is the smaller". While this is an NPPF requirement (see footnote 37, page 20) for Community Led Exception Sites, the same does not apply to Rural and First Homes Exception Sites. The WMHAPC asks that this requirement is removed from draft Policy HOU8 as it may hinder the delivery of affordable homes in suitable rural locations across Newcastle-under-Lyme</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1059
<b>Order</b>	17

<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Strategic Objectives
<b>Q6 Details</b>	<p>Tetlow King Planning (TKP) represents the West Midlands Housing Association Planning Consortium (WMHAPC) which includes leading Housing Associations across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the West Midlands region.</p> <p>As significant developers and investors in local people, the WMHAPC is well placed to contribute to Local Plan objectives and act as long-term partners in the community. Our clients play an active role in affordable housing delivery in Newcastle-Under-Lyme and so welcome this opportunity to contribute to the new Local Plan.</p> <p>The current Newcastle-Under-Lyme Core Spatial Strategy was adopted in October 2009 and covers the period 2006 to 2026. As such, it is more than five years old and out-of-date when considered against the National Planning Policy Framework (NPPF, December 2023). We support the Council's intention for the new Local Plan to have a 20-year plan period which would cover the period between 2020-2040. However, as noted from the Council's latest Local Development Scheme, the Local Plan is anticipated to be adopted by the end of 2025 to which the time horizon from adoption would be reduced to 15-years. The Government undertook its eight-week consultation on the NPPF between 30 July and 24 September 2024. We encourage the Council to understand any implications of the proposed changes to the NPPF on the production of this new Local Plan, including the new standard methodology for Local Housing Need (LHN). Further comments on this are provided in response to draft Policy PSD1 below.</p> <p>Strategic Objectives for the Borough</p> <p>Pages 10 and 11 of the Final Draft Local Plan set out a series of Strategic Objectives for the Borough. The WMHAPC is again disappointed that the delivery of affordable housing that meets the needs of the Borough's residents does not feature as a Strategic Objective of the Local Plan, particularly given the affordability challenges present within the Borough. This was expressed as a concern in the last round of consultation on the draft Plan and so it is disheartening that the recommendation has not been realised in this current version of the Local Plan.</p> <p>We note Strategic Objective 'SO-5' which seeks to "Provide a mix of housing types which are attractive to people who want to live and work in the Borough and to provide aspirational housing, which is well designed, safe, secure, and adaptable." However, this objective does not refer to a mix of tenures. The WMHAPC strongly encourage the Council to include the provision of affordable housing as a Strategic Objective for the Council.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1063
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2
<b>Q6 Details</b>	Please see attached representations. We note that draft Policy CRE2 has been re-worded to require major applications to submit an energy statement to demonstrate the maximum feasible and viable use of onsite renewable energy generation for at least 10% of their energy needs from renewable or low carbon energy generation on site unless it can be demonstrated that having regard to the type of



	development and its design that it is not feasible or viable. This is supported by the WMHAPC, however, it is not clear how the Council has derived the 10% figure and if it has been fully justified or viability tested.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1067
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE7
<b>Q6 Details</b>	Please see attached representations. Draft Policy SE7 requires developments to deliver at least a 10% measurable net gain of biodiversity habitat on site. This aligns with the national requirements for BNG introduced through the Environment Act earlier in 2024. The WMHAPC would welcome the production of a BNG supplementary planning document and/or a further implementation note/guidance following the adoption of the Local Plan for developers to understand the costs of the mandatory BNG requirement as the non-negotiable aspect of BNG requirements may impact on the viability of the sites and its ability to deliver against other policy requirements such as affordable housing.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1071
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	Please see attached representations. The WMHAPC requests that draft Policy PSD5 is revised to include a caveat that rural exception sites should be in accordance with policy HOU1 and HOU8 to ensure that optimal affordable housing delivery is facilitated. The Council's decision to review and alter the Green Belt boundary to allow for new development to meet identified housing needs is thoroughly welcomed by the WMHAPC.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1075
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards

<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q6 Details</b>	<p>Please see attached representations. We note that housing standards, previously part of draft Policy HOU2, are now addressed in a standalone policy.</p> <p>The WMHAPC previously raised concerns about the blanket application of Nationally Described Space Standards (NDSS) for all new residential developments. There are concerns that the blanket application of the NDSS across all residential development, including affordable tenures, will undermine the viability of many development schemes. This will potentially result in fewer affordable homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability.</p> <p>We highlight that the Planning Practice Guidance (PPG) requires local authorities to justify the need for NDSS through considering:</p> <ul style="list-style-type: none"> <li>•need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.</li> <li>•viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.</li> <li>•timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions." (Paragraph: 020 Reference ID: 56-020-20150327)</li> </ul> <p>In light of the above, it is not clear that the Council has provided evidence demonstrating the need for NDSS across all new developments in Newcastle-under-Lyme. If the Council continues to seek the NDSS requirement, then it must do so in line with the PPG to ensure the policy is justified and found sound at examination. It is noted that the NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard. It is not essential for all dwellings to achieve these standards in order to provide good quality living.</p> <p>It is also relevant that Homes England only requires affordable homes to meet 85% of the NDSS to receive funding. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary, as it may result in for example, higher rental and heating costs. Homes delivered in the current market by housebuilders are often lower than the 85% requirement. As such, the WMHAPC recommends that other quality standards should be used to determine housing quality, unless the Council can properly evidence the need for NDSS.</p> <p>On sites that deliver 100% affordable housing, NDSS presents issues in that it increases the risk of financial impairment. The WMHAPC members raise that if a property costs more than it is worth, which is often the case on design and build sites that are 100% affordable and in a low value area such as Newcastle-Under-Lyme, then it can cause a financial impairment, or in some cases, a loss. It is therefore imperative that schemes are able to continue to provide good quality housing but at 85% NDSS (which is the accepted position from Homes England) on sites that are delivering 100% affordable housing due to build costs. The below example has been provided by Aspire Housing Association in relation to a current scheme they have in Newcastle-Under-Lyme, which shows the financial implications of delivering 100% NDSS on 100% affordable housing schemes.</p> <p>85% NDSS Open Market Value per unit average £210k. Build Cost at 85% NDSS per unit plus acquisition and fees, less grant £196,503. Headroom per unit of £13,497</p> <p>100% NDSS Open Market Value per unit average £210k. Build Cost at 100% NDSS per unit plus acquisition and fees, less grant £213,352. Headroom per unit of £3,352.</p> <p>As can be seen, NDSS can have substantial impacts on viability. If there is an increased risk of impairment, developers will be more unlikely to deliver new affordable housing.</p> <p>Draft Policy HOU3 requires all new market and affordable housing developments to be built to meet Building Regulations M4(2) standard ('accessible and adaptable dwellings') and 10% should meet the requirements of Building Regulations M4(3) standard ('wheelchair user dwellings'). The WMHAPC accepts that there is a growing need for accessible and adaptable homes, however, there is concern that the 10% requirement for M4(3) dwellings could have considerable implications on viability and overall affordable housing delivery in Newcastle-under-Lyme. Some sites and/or schemes do not lend themselves to the statutory provision of M4(3) units. In light of this, the WMHAPC requests that the Council exercises an element of discretion when considering proposals.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations

<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1079
<b>Order</b>	60
<b>Title</b>	Policy HOU9: Community Led Exception Sites
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU9
<b>Q6 Details</b>	Please see attached representations. The WMHAPC acknowledges Community Led Exception Sites as an effective policy tool to enable the delivery of affordable housing. We also understand that these developments can often unlock small sites (which may otherwise be unattractive to large scale housebuilders) and may often garner public support in providing benefit to the local community. We take this opportunity to highlight the successful proven track record that Community Land Trusts (CLTs) have in delivering affordable housing for local people. The Council may find it insightful to know that a number of the WMHAPC Housing Associations have delivered affordable housing through partnerships with CLTs across the West Midlands. Therefore, it would be particularly useful if the Local Plan acknowledges this working relationship in order to encourage commitment in the Local Plan to support CLTs in their choice of sites.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1069
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	Please see attached representations. It is positive to see at Part 4(h) that the Council will consider development in the countryside where it "meets a demonstrable local housing need such as affordable housing and / or self-build plots." This will help to ensure that rural housing needs are met and that rural communities remain sustainable/self-supporting. We welcome new draft policies HOU8 (Rural and First Homes Exception Sites) and HOU9 (Community Led Exception Sites) which will assist in delivering new affordable housing in rural areas.
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1073
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium

<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>Please see attached representations. Given the significant need for new affordable homes in Newcastle-Under-Lyme, the WMHAPC suggests that a blanket affordable housing requirement of 30% on sites across the Borough would be more appropriate than the proposed stepped policy (currently based on a land value approach) that requires:</p> <ul style="list-style-type: none"> <li>• 30% affordable housing on greenfield sites;</li> <li>• 15% on brownfield sites in low value zones (the north of the Borough); and</li> <li>• 25% on brownfield sites in high value zones (the south of the Borough).</li> </ul> <p>The WMHAPC asks the Council to consider a blanket 30% requirement for affordable housing to optimise the delivery of affordable housing across the Borough regardless of the land value. We previously queried the evidence based used for to justify the reduced affordable housing requirement on low value brownfield sites in which the policy proposes 15%. Furthermore, and in light of the Borough's substantial need for affordable housing as highlighted in the HEDNA (2024) of delivering 278 dpa of affordable housing, the Council should avoid progressing an emerging policy that would potentially secure less affordable housing than current adopted Policy CSP6 which requires 25% affordable housing on qualifying sites.</p> <p>The WMHAPC is pleased that the Council has incorporated our previous advice on when it is appropriate to secure affordable housing in perpetuity. Draft Policy HOU1 no longer requires all affordable homes to be secured in perpetuity, with the emerging Local Plan reserving the requirement for rural exception sites only under draft Policy HOU8.</p> <p>It is welcoming to see that the housing tenure mix policy has amended in this Regulation 19 version of the Plan to require 25% as First Homes with the tenure split for affordable housing 'provided in line with the latest evidence', which is suitably flexible to account for changing housing needs over the plan period and site specific issues. This being said, there is ongoing concern regarding the Council's proposal to require 25% of affordable housing on-site to be First Homes. This approach heavily restricts the delivery of other effective affordable housing products such as affordable rent and shared ownership. Members of the WMHAPC who operate within Newcastle-under-Lyme, emphasise the importance of shared ownership homes, which offer a flexible path to homeownership. Insufficient earnings to access a mortgage is a major barrier alongside insufficient savings for a deposit. Shared ownership allows buyers to begin with a 25% share and potentially staircase to full ownership, providing an accessible option for those with limited savings or income. However, under the current policy, the delivery of shared ownership homes may become more unlikely.</p> <p>Although it is acknowledged that the revised NPPF is not yet adopted, it is pertinent to note that the requirement for 25% of affordable tenures being First Homes has been proposed to be removed entirely by the new Government. As has been observed across the industry in recent years, housebuilders are generally not set up in way to provide First Homes. The WMHAPC members have specified that they would typically offer circa 70% of market value for shared ownership/intermediate housing which housebuilders typically favour. On sites that are delivering relatively small numbers of S106 homes, the First Homes requirement often makes it unnecessarily complex for developers and housing providers. It is suggested that Newcastle-Under-Lyme could develop its affordable housing allocations policy to prioritise those people that would have been eligible for First Homes. The WMHAPC members have specified that they would not act as First Homes agents.</p> <p>Criterion 7 of draft Policy HOU1 requires pepper-potting of affordable housing on new residential schemes. Whilst we advocate for a well-integrated and varied distribution of affordable housing within housing schemes, we highlight to the Council that this approach makes management more difficult as the properties are more spread out. It is noted that the council has caveated the proposed policy requirement by stating that: "unless specific circumstance suggests clustering and/or a distinctive design is appropriate. The exception is blocks of flats, where a mixed tenure block can potentially cause management and leasehold issues." The WMHAPC recommends that the Council take a more general flexible approach to pepper potting or clustering to allow for ease of asset maintenance and management for the affordable housing providers.</p> <p>We would like the Local Plan to acknowledge the role of Housing Associations in providing affordable housing in Birmingham. It would be beneficial to see the Council recognise the role of Housing Associations and encourage developers to have early active engagement with Housing Associations in the preparation of planning proposals. Early engagement enables Housing Associations to have an active role in the planning and design of developments to ensure that the development addresses local housing needs and meets the management requirements of WMHAPC members.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>
<b>Comment ID</b>	NULLP1065
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision

<b>Consultee Company / Organisation</b>	West Midlands Housing Association Planning Consortium
<b>Consultee Family Name</b>	Planning Consortium
<b>Consultee Given Name</b>	West Midlands Housing Association
<b>Agent Company / Organisation</b>	Tetlow King
<b>Agent Position</b>	Planner
<b>Agent Family Name</b>	Luong
<b>Agent Given Name</b>	Lisa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q6 Details</b>	Please see attached representations. The WMHAPC supports the Council's shift toward assessing open space provision on a site-by-site basis, considering the location, type, and scale of the development, rather than applying a blanket requirement to all new residential developments. This tailored approach allows for more appropriate and context-sensitive open space solutions. We recommend that proposed open space provisions demonstrate community support, rather than solely relying on existing strategies. This would ensure that developments align with local needs and preferences. but as an additional requirement for example provision types need to show community support not just reliance on strategies. The WMHAPC suggests that draft Policy SE6 could be improved by establishing clearer links to Policy SE7 Biodiversity Net Gain (BNG).
<b>Q7 Modification</b>	Please see attached representations
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1340021 West Midlands Housing Association Planning Consortium.pdf</a>

<b>Comment ID</b>	NULLP447
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Platt
<b>Consultee Given Name</b>	Cheryl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>As a country we should be doing what is right for the generations to come, for the sake of our grandchildren and great grandchildren. Do we want to leave them with a concrete land, where they cannot breathe and where they cannot feed themselves, as the generations before them were greedy for short term gain and destructive of precious greenbelt land that keeps us all alive.</p> <p>Be brave and look for brownfield alternatives within the area instead of easy greenfield sites that make money for the few.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP449
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Platt
<b>Consultee Given Name</b>	Cheryl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>As a country we should be doing what is right for the generations to come, for the sake of our grandchildren and great grandchildren. Do we want to leave them with a concrete land, where they cannot breathe and where they cannot feed themselves, as the generations before them were greedy for short term gain and destructive of precious greenbelt land that keeps us all alive.</p> <p>Be brave and look for brownfield alternatives within the area instead of easy greenfield sites that make money for the few.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP450
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Platt
<b>Consultee Given Name</b>	Cheryl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>As a country we should be doing what is right for the generations to come, for the sake of our grandchildren and great grandchildren. Do we want to leave them with a concrete land, where they cannot breathe and where they cannot feed themselves, as the generations before them were greedy for short term gain and destructive of precious greenbelt land that keeps us all alive.</p> <p>Be brave and look for brownfield alternatives within the area instead of easy greenfield sites that make money for the few.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP448
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Platt
<b>Consultee Given Name</b>	Cheryl
<b>Q4 Part of document</b>	Policy



<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>As a country we should be doing what is right for the generations to come, for the sake of our grandchildren and great grandchildren. Do we want to leave them with a concrete land, where they cannot breathe and where they cannot feed themselves, as the generations before them were greedy for short term gain and destructive of precious greenbelt land that keeps us all alive.</p> <p>Be brave and look for brownfield alternatives within the area instead of easy greenfield sites that make money for the few.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP500
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Poppleton
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB12 I believe that the plan for 125 houses will accessibility from Diglake Street to be unsound living on that street but also feel like much of the following applies to both AB12, AB33, AB15. The road is already congested and has very limited accessibility. At peak times it is hard to park cars and get cars and people safely down the street. The roads are too narrow and the junctions onto the main road are already extremely busy and dangerous without the additional traffic from 125 houses, utilising both Diglake Street and Albert Street and Chapel Street, with Ravensmead School just a few minutes down the road. The increase traffic would also cause more danger to those children travelling to school and living on the streets surrounding the new development.</p> <p>Pedestrian and cyclist access through the park is also a concern given that the majority of people down the street have families and small yards the park used by families in the area, taking parts of it away and again the increased traffic is a concern and unjust.</p> <p>A car park will not solve these issues and restricts residents on being able to park outside their houses to unload shopping, those with small children or with disabilities.</p> <p>The reason we chose this house was due to the views from our rear garden fields, the greenbelt and views to the monument with this development you are seriously affecting the views from our house and also potentially the sale value of our home. Given that we have had sheep in this field also I am concerned into yet more farmland being destroyed and the impact on our environment taking yet more of our greenbelt. Given the flooding in nearby Brierly Brook I feel that this development would also affect that as well as the surrounding fields and farmland.</p> <p>Traffic flow through Bignall End in general is already at a maximum increasing traffic both through AB33 and AB12 this would be further increase this beyond capacity. I also fear of the effect this will have on the GP, local schools etc. With all of this what is being proposed is just not justified or needed and is unsound and should not go ahead and should be removed from the local plan.</p> <p>In relation to AB2 there is no evidence that this will give people within the local area jobs and or attract people to the local area and again taking from our greenbelt. There are already significant levels of traffic at the M6 junc 16 and accidents at that junction regularly and already heavy impact on the A500 this is just going to exasberate this further and there is no evidence to say it will do what the council are saying.</p>
<b>Q7 Modification</b>	The best way to modify this is to remove AB12, AB33, AB15 AB2 they are unsound and unjustified.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP503
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Poppleton
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB12 I believe that the plan for 125 houses will accessibility from Diglake Street to be unsound living on that street but also feel like much of the following applies to both AB12, AB33, AB15. The road is already congested and has very limited accessibility. At peak times it is hard to park cars and get cars and people safely down the street. The roads are too narrow and the junctions onto the main road are already extremely busy and dangerous without the additional traffic from 125 houses, utilising both Diglake Street and Albert Street and Chapel Street, with Ravensmead School just a few minutes down the road. The increase traffic would also cause more danger to those children travelling to school and living on the streets surrounding the new development.</p> <p>Pedestrian and cyclist access through the park is also a concern given that the majority of people down the street have families and small yards the park used by families in the area, taking parts of it away and again the increased traffic is a concern and unjust.</p> <p>A car park will not solve these issues and restricts residents on being able to park outside their houses to unload shopping, those with small children or with disabilities.</p> <p>The reason we chose this house was due to the views from our rear garden fields, the greenbelt and views to the monument with this development you are seriously affecting the views from our house and</p>

	<p>also potentially the sale value of our home. Given that we have had sheep in this field also I am concerned into yet more farmland being destroyed and the impact on our environment taking yet more of our greenbelt. Given the flooding in nearby Brierly Brook I feel that this development would also affect that as well as the surrounding fields and farmland.</p> <p>Traffic flow through Bignall End in general is already at a maximum increasing traffic both through AB33 and AB12 this would be further increase this beyond capacity. I also fear of the effect this will have on the GP, local schools etc. With all of this what is being proposed is just not justified or needed and is unsound and should not go ahead and should be removed from the local plan.</p> <p>In relation to AB2 there is no evidence that this will give people within the local area jobs and or attract people to the local area and again taking from our greenbelt. There are already significant levels of traffic at the M6 junc 16 and accidents at that junction regularly and already heavy impact on the A500 this is just going to exasberate this further and there is no evidence to say it will do what the council are saying.</p>
<b>Q7 Modification</b>	The best way to modify this is to remove AB12, AB33, AB15 AB2 they are unsound and unjustified.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP509
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Poppleton
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>AB12 I believe that the plan for 125 houses will accessibility from Diglake Street to be unsound living on that street but also feel like much of the following applies to both AB12, AB33, AB15. The road is already congested and has very limited accessibility. At peak times it is hard to park cars and get cars and people safely down the street. The roads are too narrow and the junctions onto the main road are already extremely busy and dangerous without the additional traffic from 125 houses, utilising both Diglake Street and Albert Street and Chapel Street, with Ravensmead School just a few minutes down the road. The increase traffic would also cause more danger to those children travelling to school and living on the streets surrounding the new development.</p> <p>Pedestrian and cyclist access through the park is also a concern given that the majority of people down the street have families and small yards the park used by families in the area, taking parts of it away and again the increased traffic is a concern and unjust.</p> <p>A car park will not solve these issues and restricts residents on being able to park outside their houses to unload shopping, those with small children or with disabilities.</p> <p>The reason we chose this house was due to the views from our rear garden fields, the greenbelt and views to the monument with this development you are seriously affecting the views from our house and also potentially the sale value of our home. Given that we have had sheep in this field also I am concerned into yet more farmland being destroyed and the impact on our environment taking yet more of our greenbelt. Given the flooding in nearby Brierly Brook I feel that this development would also affect that as well as the surrounding fields and farmland.</p> <p>Traffic flow through Bignall End in general is already at a maximum increasing traffic both through AB33 and AB12 this would be further increase this beyond capacity. I also fear of the effect this will have on the GP, local schools etc. With all of this what is being proposed is just not justified or needed and is unsound and should not go ahead and should be removed from the local plan.</p> <p>In relation to AB2 there is no evidence that this will give people within the local area jobs and or attract people to the local area and again taking from our greenbelt. There are already significant levels of traffic at the M6 junc 16 and accidents at that junction regularly and already heavy impact on the A500 this is just going to exasberate this further and there is no evidence to say it will do what the council are saying.</p>
<b>Q7 Modification</b>	The best way to modify this is to remove AB12, AB33, AB15 AB2 they are unsound and unjustified.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP517
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Poppleton
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No

<b>Q6 Details</b>	<p>AB12 I believe that the plan for 125 houses will accessibility from Diglake Street to be unsound living on that street but also feel like much of the following applies to both AB12, AB33, AB15. The road is already congested and has very limited accessibility. At peak times it is hard to park cars and get cars and people safely down the street. The roads are too narrow and the junctions onto the main road are already extremely busy and dangerous without the additional traffic from 125 houses, utilising both Diglake Street and Albert Street and Chapel Street, with Ravensmead School just a few minutes down the road. The increase traffic would also cause more danger to those children travelling to school and living on the streets surrounding the new development.</p> <p>Pedestrian and cyclist access through the park is also a concern given that the majority of people down the street have families and small yards the park used by families in the area, taking parts of it away and again the increased traffic is a concern and unjust.</p> <p>A car park will not solve these issues and restricts residents on being able to park outside their houses to unload shopping, those with small children or with disabilities.</p> <p>The reason we chose this house was due to the views from our rear garden fields, the greenbelt and views to the monument with this development you are seriously affecting the views from our house and also potentially the sale value of our home. Given that we have had sheep in this field also I am concerned into yet more farmland being destroyed and the impact on our environment taking yet more of our greenbelt. Given the flooding in nearby Brierly Brook I feel that this development would also affect that as well as the surrounding fields and farmland.</p> <p>Traffic flow through Bignall End in general is already at a maximum increasing traffic both through AB33 and AB12 this would be further increase this beyond capacity. I also fear of the effect this will have on the GP, local schools etc. With all of this what is being proposed is just not justified or needed and is unsound and should not go ahead and should be removed from the local plan.</p> <p>In relation to AB2 there is no evidence that this will give people within the local area jobs and or attract people to the local area and again taking from our greenbelt. There are already significant levels of traffic at the M6 junc 16 and accidents at that junction regularly and already heavy impact on the A500 this is just going to exasberate this further and there is no evidence to say it will do what the council are saying.</p>
<b>Q7 Modification</b>	The best way to modify this is to remove AB12, AB33, AB15 AB2 they are unsound and unjustified.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP79
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Potts
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2 & AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>AB2:</p> <p>The development proposal for AB2 is not a sound proposal due to the significant additional traffic that will result from lorries, service vehicles and employee transport to and from the site. The junction of the A500 at Audley is already an accident black spot and without significant alterations to the junction and its approaches, there will inevitably be fatalities and serious injury from road traffic collisions.</p> <p>The local area is not well served by public transport. The hilly terrain in the locality and lack of cycle lanes on roads due to their narrow nature is not likely to make cycling to the site a realistic option. Therefore there will be significant additional traffic congestion along the A500, at the A500 Audley junction, the M6/A500 junction and along Ravens Lane which is used as a cut-through- especially when there are problems on the M6/A34. This happens already when there are lane closures on the M6 and the creation of factory/warehousing at the proposed site will add significantly more traffic.</p> <p>Lorries already use the B5500 on a daily basis and throughout the evening rather than taking the A34 &amp; A500 which are more suitable for HGV traffic. The creation of the development AB2 does not indicate how lorry traffic will be restricted from using this route. It is likely, we will see such traffic 24 hrs a day.</p> <p>AB12: The development is not a sound proposal. The plans state that the B5500 Ravens Lane will be an emergency access point to the site, and access will be from Diglake Street. The proposal does not show a viable and realistic route that traffic will take to reach Diglake. The most likely route is to be from Albert Street and New Road or from the other direction- the B5500 Ravens Lane. This road is already a very congested route as vehicles are double parked along the road with large vehicles, buses etc finding it very difficult to pass. Without significant mitigation, the congestion along the adjoining roads to Diglake Street will be terrible.</p>
<b>Q7 Modification</b>	<p>AB2- For this proposal to be sound, there needs to be significant alteration to the A500/Audley junction to improve road safety, for example, the installation of rumble strips, a roundabout, speed cameras or traffic lights. There needs to be significant investment in public transport and provision of park and ride schemes. Cycle lane construction will require major road and cycle path development in between the site and local villages. In addition, enforced weight restrictions need to be put in place along New Rd and B5500 to prevent HGVs from using it.</p> <p>AB12- For this proposal to be sound, the existing parking issues along B5500/Ravens Lane need to be properly addressed. Car parking for residents in terraced housing along Ravens Lane needs to be fully included in the proposals for development. An access road could be built to service both AB12 and off-street car parking areas to the rear of terraced housing (on existing low quality agricultural land) to the rear of Ravens Lane. Double yellow lines should then be installed along Ravens Lane.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP82
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Potts
<b>Consultee Given Name</b>	William
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2 & AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>AB2:</p> <p>The development proposal for AB2 is not a sound proposal due to the significant additional traffic that will result from lorries, service vehicles and employee transport to and from the site. The junction of the A500 at Audley is already an accident black spot and without significant alterations to the junction and its approaches, there will inevitably be fatalities and serious injury from road traffic collisions.</p>

	<p>The local area is not well served by public transport. The hilly terrain in the locality and lack of cycle lanes on roads due to their narrow nature is not likely to make cycling to the site a realistic option. Therefore there will be significant additional traffic congestion along the A500, at the A500 Audley junction, the M6/A500 junction and along Ravens Lane which is used as a cut-through- especially when there are problems on the M6/A34. This happens already when there are lane closures on the M6 and the creation of factory/warehousing at the proposed site will add significantly more traffic.</p> <p>Lorries already use the B5500 on a daily basis and throughout the evening rather than taking the A34 &amp; A500 which are more suitable for HGV traffic. The creation of the development AB2 does not indicate how lorry traffic will be restricted from using this route. It is likely, we will see such traffic 24 hrs a day.</p> <p>AB12: The development is not a sound proposal. The plans state that the B5500 Ravens Lane will be an emergency access point to the site, and access will be from Diglake Street. The proposal does not show a viable and realistic route that traffic will take to reach Diglake. The most likely route is to be from Albert Street and New Road or from the other direction- the B5500 Ravens Lane . This road is already a very congested route as vehicles are double parked along the road with large vehicles, buses etc finding it very difficult to pass. Without significant mitigation, the congestion along the adjoining roads to Diglake Street will be terrible.</p>
<b>Q7 Modification</b>	<p>AB2- For this proposal to be sound, there needs to be significant alteration to the A500/Audley junction to improve road safety, for example, the installation of rumble strips, a roundabout, speed cameras or traffic lights. There needs to be significant investment in public transport and provision of park and ride schemes. Cycle lane construction will require major road and cycle path development in between the site and local villages. In addition, enforced weight restrictions need to be put in place along New Rd and B5500 to prevent HGVs from using it.</p> <p>AB12- For this proposal to be sound, the existing parking issues along B5500/Ravens Lane need to be properly addressed. Car parking for residents in terraced housing along Ravens Lane needs to be fully included in the proposals for development. An access road could be built to service both AB12 and off-street car parking areas to the rear of terraced housing (on existing low quality agricultural land) to the rear of Ravens Lane. Double yellow lines should then be installed along Ravens Lane.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP970
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>We support the University's aspirations for growth and agree that it plays a critical role in the ongoing development of the Borough. We refer you to the comments made in our submission to the previous consultation regarding the need to be realistic about this growth.</p> <p>We are concerned that the proposal for a link road between the A53 and A525 is too vague. It is not based on robust and credible evidence. No details are given regarding the route and we assume that it would traverse the estate of the University, going from TB19 to the A525. Details are needed regarding what vehicles would be allowed to use this road. Were it to be open to all traffic, this would create a 'rat run' through the University's estate. Have they given permission for this? If this is the intention and the university were to agree, this would place a significant additional load on the busy University roundabout onto the A525. It would also undermine the sustainability credentials of the University and contradict policy SE1, particularly with regard to air quality. We strongly urge that further detail be provided about this proposal and that access be restricted to sustainable transport (foot, cycle, buses) and potentially, University employees.</p>
<b>Comment ID</b>	NULLP971
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>We support the University's aspirations for growth and agree that it plays a critical role in the ongoing development of the Borough. We refer you to the comments made in our submission to the previous consultation regarding the need to be realistic about this growth.</p> <p>We are concerned that the proposal for a link road between the A53 and A525 is too vague. It is not based on robust and credible evidence. No details are given regarding the route and we assume that it would traverse the estate of the University, going from TB19 to the A525. Details are needed regarding what vehicles would be allowed to use this road. Were it to be open to all traffic, this would create a 'rat run' through the University's estate. Have they given permission for this? If this is the intention and the university were to agree, this would place a significant additional load on the busy University roundabout onto the A525. It would also undermine the sustainability credentials of the University and contradict policy SE1, particularly with regard to air quality. We strongly urge that further detail be provided about this proposal and that access be restricted to sustainable transport (foot, cycle, buses) and potentially, University employees.</p>
<b>Comment ID</b>	NULLP975
<b>Order</b>	42

<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>The Affordable Housing strategy needs further work. It is far from clear how the allocations in HOU1</p> <ul style="list-style-type: none"> <li>• 30% on Greenfield Sites</li> <li>• 15% on Brownfield Sites in the 'Low Value Zone'.</li> <li>• 25% on Brownfield Sites in the 'High Value Zone'.</li> </ul> <p>could yield the 278 affordable homes needed per annum, as identified in the HNA 2024 when 400 houses per annum are being built. This portion of the plan is thus not effective nor credible.</p>
<b>Comment ID</b>	NULLP969
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>Our comments will thus address aspects of the plan which we judge are weak and require further thought in order for the plan to pass.</p> <p>Comments on Audley AB2</p> <p>We are concerned that this proposal is weak in the following areas. The development of this strategic employment site is neither based on robust and credible evidence nor is it the most appropriate strategy when compared with alternatives. This site is in Greenbelt and requires that exceptional need be demonstrated for its release. We made the following comment in our submission on the previous draft: The Turley report does not clearly evidence a lack of land for such development but merely suggests it may be the case. Employment in logistics is relatively low paid and the need for physical labour in this sector is being greatly reduced by robotics. The vision of the area as an ever-growing logistics hub lacks vision and will not create a high skilled, prosperous future for the Borough. Increasingly, green field sites outside of urban areas is favoured for the development of such sites. The release of this site impacts significantly on the protection offered by the green belt to communities such as Talke and Audley. Our view on this matter has not changed.</p> <p>In addition, given the need to provide a new junction onto the A500, we also question its deliverability. As a substantial element of the site will be given over to logistics, this will involve considerable movement of heavy traffic and it is difficult to imagine what mitigation measures might be put in place with regard to junction 16 of the M6, nor indeed with regard to congestion on the already busy A500. This also applies to measures to mitigate the environmental impact of the development. In addition, further detail would be welcome about the 'emergency access onto Barthomley Road. How would this be controlled and what is meant by 'emergency access'? . In terms of deliverability, it is also unclear how the site might be accessed by sustainable travel, apart from buses in the absence of any mapped access for pedestrians or bicycles.</p> <p>We judge that this proposal risks rejection at Inspection for the reason we have outlined. If it is included, a the very least, this proposal needs much more detail concerning access and egress to the site and proposed mitigation measures.</p>
<b>Comment ID</b>	NULLP973

<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>Many of the points made above about SP11 are relevant to this site which is adjacent to SP11. For brevity, we will not reiterate them. We note proposals to link this site to SP11(4). If this is done SP23 and SP11(4) are effectively a single site.</p> <p>In addition we note that the development includes land which visually forms part of the large field visible from the Gallowstree roundabout and Cemetery Road. Whilst we welcome the protection of the terminal portion of the field, it is not clear how this land will be 'protected' from speculative development in the future.</p> <p>We object to the proposal as it stands as it will impact on the local landscape and views.</p> <p>The provided plan shows a number of field boundaries, in order to protect the iconic approach to Keele University, up the sweep of the existing field to the ridge, we urge that the protected area be expanded to include the adjacent area, up to the blue line shown on the map below (see attachment). Not to do so risks damage to a key view (ref. SE10-c) for a relatively small gain in housing.</p>
<b>Attachments</b>	<a href="#">1305786 Keele Parish Council.docx</a>
<b>Comment ID</b>	NULLP974
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>Whilst having no objection to the housing proposal as such, we note that 550 homes adds to the 800 homes on SP11, 200 on SP23 and other smaller local developments. This large number of new residents in this area will inevitably impact on local transport networks and services. We do not judge that sufficient evidence has been provided that such services and any potential improvement of them will meet need. We are all aware that this is a common issue with large scale development. This uncertainty is further exacerbated by a failure to indicate in housing proposals which urban or rural centre residents are expected to use.</p> <p>With regard to R19, please refer to our comments on the proposed link road between the A53 and A525, in the section SP11, above. We do not judge such a road, with full access to all vehicles, to be deliverable nor in alignment with the plan's environmental policies. We will seek to raise this matter at Inspection unless the final submission makes clear that access will be limited. We note, that without access to campus via such a road, there would also be no straightforward access to facilities on campus. With a public access road, there would be considerable extra traffic on the University's roads and pressure on very limited parking.</p>
<b>Comment ID</b>	NULLP972
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale

<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>e welcome the inclusion of a Country Park in the housing proposals for this site. A failure to provide a key to the map indicating the area to be removed from Greenbelt needs to be addressed as this constitutes a lack of proper justification and is easily corrected. If the red line on the map represents the area to be removed, we are concerned that it is proposed to take the land for the Country Park out of the green belt. Once this has happened, it is difficult to see how the land will be protected from future proposals for housing or other development and thus compromises deliverability. We also note that the plan suggests an island of Country Park between SP11 (2). Whilst recognising that this may be accessed by walking routes through SP11(2), further elaboration on this in the final submission would enhance the deliverability of this element.</p> <p>We judge that retention of the Country Park within the Greenbelt would allow PSD5-6 to be properly addressed and be in line with a number of other policies concerning recreation and environmental protection.</p> <p>It is unclear which Rural or Urban centre will service the proposed housing. We have already mentioned that the failure to include Silverdale in the settlement hierarchy is an error. Silverdale is a distinct village with a proud history and many facilities. The failure to mention it anywhere in the settlement hierarchy compromises the effectiveness of the document and undermines the proposals for this site. Two of the exit roads proposed will be into Silverdale. The plan notes:</p> <p>The Council has sought to direct the greatest level of development to the higher tiers of the settlement hierarchy. These have the highest levels of service provision and infrastructure, as well as the best sustainable transport opportunities in the Borough. Rural centres will take a smaller share of the overall levels of growth, to support the viability of services and facilities and the vitality of these centres.</p> <p>The plan does not make clear which centre will service these residents and it is far from obvious when Silverdale has not been included in the hierarchy. Equally, it is not clear which centre will service SP11(2) and (1). Whilst it may be assumed that these homes will access services at Keele University, this is not stated. No consideration has been given to the very limited parking available at the University nor the additional traffic impact resulting from this. The failure to provide any details of road links between the two 'islands' constituting SP11(3) undermines the effectiveness of the plan.</p> <p>We note that the plan gives no housing density figures for these sites. Are we correct in assuming that SP11 is regarded as development within a Rural Centre and thus that density should be 20-30 dwellings per hectare? Would density be calculated locally in each 'island' or by dividing the number of homes across the site by the total area, including the Country Park.</p> <p>Whilst we welcome the inclusion of a local centre to include a local health centre, it is unclear what else constitutes local services and facilities. Is there any plan to include retailing in this local centre. We also note that no location is suggested for this centre. As the development consists of 4 'island' villages, how is it proposed that residents from all 'islands' would be able to access the local centre sited in one of the settlements when separated by a Country Park? We note the proposal for an internal link road between SP(3) and SP11(2) and SP11(1) but no proposed route is shown. Such a road risks undermining the integrity of the Country Park if not properly planned. In addition, no such link is suggested between SP11(4) and SP11 (1+2). If residents would need to use existing roads to access the local centre, this would compromise the viability and localness of the proposed centre. This matter must be addressed to bolster the effectiveness and deliverability of the proposals in SP11.</p> <p>An additional Primary school on site may prove to be necessary but no evidence is provided regarding existing capacity in local Primary Schools. Details need to be provided about when such a school would be provided in the long development process for the site. Were the school to be provided at the beginning of the development it would risk undermining the sustainability of existing local schools or failing to attract sufficient children to itself be sustainable. If provided towards the end of the development of new housing, then local schools may lack capacity to accommodate the children of new residents. In order to ensure the effectiveness of the plan and its deliverability, it is critical that additional evidence be provided and referred to in the plan.</p> <p>We welcome the details provided in this policy element regarding dispersed access through 4 separate access roads. This goes some way towards addressing our concerns regarding traffic congestion.</p> <p>However, we note that SP11(3) will be accessed via Ashbourne Drive and SP11(4) by Park Road. These are currently narrow, domestic roads lined with housing. The traffic generated by 235 and 100 homes will be significant. We urge that to support the effectiveness of these proposals, evidence be provided on the likely impact of additional traffic on these roads and on the road network of Silverdale in general. On the same theme, that the plan proposes:</p> <p>Development of the site may require junction improvements and offsite improvements secured through financial contributions.</p> <p>The absence of any transport studies or further detail at this stage assumes that such improvements are possible. This is by no means clear and thus the lack of evidence makes deliverability uncertain. In short,</p>

	<p>we recommend further transport studies be included in the final submission to ensure deliverability and effectiveness.</p> <p>Keele Parish Council will seek to raise these issues at Inspection, irrespective of the risks of the plan being rejected or sent back for further modification with increased housing targets.</p> <p>Finally SP11 notes contributions required for a local health hub, schools and highway improvements.</p> <p>Drainage/ flood mitigation on the site is a complex issue, the coal mining risk assessment is outstanding, odour from Walley's quarry will delay development of parts of the site. Are you sure this proposal will be attractive to developers and that we will not have pleas from them that the required contributions will impact on financial viability? We remain sceptical regarding deliverability.</p>
<b>Comment ID</b>	NULLP976
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Keele Parish Council
<b>Consultee Position</b>	Parish Clerk
<b>Consultee Family Name</b>	Powell
<b>Consultee Given Name</b>	Debra
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>Keele Parish Council recognise that developing national policy with regard to the NPPF means that, in order for the plan to be considered under the existing regulations, the amount of housing delivered per annum must come within 200 of the proposed nationally set target. The proposed new algorithm is 593 per annum. Whilst we do not accept the proposed target of 400 houses per annum is robustly supported by the evidence provided, we recognise that, were the plan to fail at inspection, that this already inflated target would, in all likelihood, be subject to a mandatory increase. Thus we have no choice other than to support this target in the hope that the plan will pass.</p> <p>The plan notes:</p> <p>5.14 The Council has sought to direct the greatest level of development to the higher tiers of the settlement hierarchy. These have the highest levels of service provision and infrastructure, as well as the best sustainable transport opportunities in the Borough. Rural centres will take a smaller share of the overall levels of growth, to support the viability of services and facilities and the vitality of these centres. However, Keele and Silverdale are taking a very high level of housing with 1100 homes being planned on the major sites (above). If TB19 is included, the number rises to 1650 homes. As previously noted, the settlement hierarchy notes Keele as a rural centre and omits Silverdale altogether. Thus housing allocations contradict PSD2 and appear opportunistic rather than planned. This undermines the effectiveness of the plan, a point we will hope to make at Inspection.</p>

Swifts Local Network: Swifts & Planning Group, Chair, Prialux, Mike

<b>Comment ID</b>	NULLP428
<b>Order</b>	115
<b>Title</b>	Policy SE8: Biodiversity and Geodiversity
<b>Consultee Company / Organisation</b>	Swifts Local Network: Swifts & Planning Group
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Prialux
<b>Consultee Given Name</b>	Mike
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE8 Biodiversity and Geodiversity
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	effective national policy, policy, National policies <a href="https://democracy.towerhamlets.gov.uk/mg/issue-history/Home.aspx?Id=136448">https://democracy.towerhamlets.gov.uk/mg/issue-history/Home.aspx?Id=136448</a> policye Policy, policy
<b>Q7 Modification</b>	
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To provide further information, if required.
<b>Comment ID</b>	NULLP437
<b>Order</b>	115
<b>Title</b>	Policy SE8: Biodiversity and Geodiversity
<b>Consultee Company / Organisation</b>	Swifts Local Network: Swifts & Planning Group
<b>Consultee Position</b>	Chair
<b>Consultee Family Name</b>	Prialux
<b>Consultee Given Name</b>	Mike
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE8
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Comments regarding SE8/11.45 entered in next sub-section to avoid duplication.
<b>Q7 Modification</b>	Please add to Policy SE8: Swift bricks are a universal nest brick for small bird species and should be installed in all new developments including extensions in accordance with best-practice guidance such as BS 42021 or CIEEM.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To provide further information, if required.



<b>Comment ID</b>	NULLP210
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Price
<b>Consultee Given Name</b>	A R J
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Good Morning, I think your proposed access is good ,the possible access especially from SP11(3) is not good at all it would bring more traffic to an already busy village,it would be better if the bottom section of houses at sp11(3) were joined with the larger mass of houses to the south?and the possible access onto the Racecourse isn't a very good idea when you consider the size of the existing road the already congested periods at school time,and lack of parking for existing residents,the 5 permanent pitches for travellers isn't a bad idea but would be much better accessed from where the eyesore of a depot is on the bend in cemetery road or compulsory purchase the depot and have a bigger site for travellers.</p>

<b>Comment ID</b>	NULLP706
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Pustkowski
<b>Consultee Given Name</b>	Naomi
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Hello, I am writing to object to the following proposed planning application.</p> <p>AB2 - approach to strategic allocations</p> <p>I am concerned as to how the traffic will get to and from this site? The site will have both warehouses and other industrial units. Whilst much of the logistics traffic might only use the M6 and A500 (when there are no blockages on those roads). but what about the employees, local service vehicles and vehicles going to and from the industrial units?</p> <p>All existing access to the A500 is by grade separated junctions (from the M6 junction 15 up to the M6 junction 16) or roundabouts (from the M6 junction 16 to Nantwich). Any other junction would not be safe. However, a roundabout so close to the M6 junction 16 would cause traffic problems (not to mention the loss of the well used layby).</p> <p>The traffic is already extremely dangerous especially at peak times, there are no traffic calming measures coming in and out of Audley village, and I have personally witnessed many near misses of people getting on and off the a500. There have been multiple collisions also.</p> <p>The already high levels of traffic at junction16 of the M6 and the surrounding villages means that the junction will require a major upgrade. The required funding from Highways England is unlikely to be forthcoming, due to the £22 billion shortfall in</p> <p>the nations finances. This is not deliverable before the end of the local plan period (2040), therefore it is ineffective hence unsound.</p> <p>It is also undeveloped land, a very good natural carbon storage area, whilst the development will increase carbon emissions.</p> <p>Many of the hedges are very old (appearing on Victorian maps) with a wide range of tree species in them. They are protected hedges, (redacted by admin) and we see lots of wildlife on this site. Hedgehogs live in these hedges, these are protected. We have seen birds such as swifts, swallows, house martins, rare lapwings amongst many others on this site. Alongside hares which are also protected, a wonderful sight to see! It would be terrible to see this habitat for local wildlife to be ripped up and built on. We also see bats around this site at dusk, another protected species.</p> <p>Our green spaces are of the utmost importance for so many reasons. I find the fresh air, and countryside vital to good mental health, and green belt land absolutely mandatory for the well-being of not only us to exercise and to teach (redacted by admin) about the importance of nature and it's purpose. But also for the animals living in these areas to live and to thrive which are already on the decline. It is our duty to protect them!</p> <p>I would also urge the council to think about the kind of jobs they would be bringing to the borough, warehousing would be low skilled, low paid jobs, high skilled, high paid jobs would be beneficial.</p> <p>The site is right on the edge of the Borough (and the West Midlands region), which means that economic impact on Newcastle Under Lyme is limited.</p> <p>The site is in the Green Belt, and it is isolated and disconnected from Audley and Signal End settlements. It will mean a huge loss of open countryside (an area as big as the village of Audley and a considerable percentage of the parish).</p> <p>It is isolated from the main conurbations of Newcastle Under Lyme and Kidsgrove, creating an urban blot on the landscape.</p> <p>Due to its isolation, there are no local services nearby. It is distant from public transport links? And is too far to travel by bike from many local housing areas.</p> <p>There are numerous empty warehouses in and around Staffordshire, there is no need to build more without using the ones already built and not in use.</p> <p>I also find that our village is already overrun with too much traffic in general, without the added traffic that a large warehouse would bring. Church street in particular is already chaos with too much traffic, as is Chester road (redacted by admin). There are already signs saying that it is not suitable for HGV's - the signage is ignored and there are many near misses of traffic collisions when the trucks are blindly trying to turn at the bottom of the road, or travelling up the street when cars are parked either side. Our village really cannot take any more traffic.</p> <p>I fear that our village will become like alsager and will be too commercialised with all care for wildlife, residents, green spaces gone.</p> <p>I don't believe the proposed plan to be sound or justifiable for the above reasons, and would like to ask the planning inspector to remove this site from the local plan.</p>
<b>Comment ID</b>	NULLP699
<b>Order</b>	151

<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Pustkowski
<b>Consultee Given Name</b>	Naomi
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I am emailing to object to the proposed development on site AB15.</p> <p>I do not believe that the plan is sound or justifiable, for the below reasons.</p> <p>The overall NULBC housing numbers cannot be justified: The population of the Borough is falling (a 0.5% drop from 2011 to 2021) which suggests a lower Household forecast.</p> <p>The number of new dwellings built in the Borough in excess of the targets in previous years (32% over the target from the 2018-19 year to the 2020-21 year) and the excess in neighbouring authorities. People from Kidsgrove will live in new builds in Golden Hill, even though it's technically in Stoke, people from Audley will live the new builds in Alsager, even though it is Cheshire East and people from Baldwins Gate &amp; Loggerheads will live in new builds in Market Drayton, even though it's in Shropshire.</p> <p>Housebuilding has exceeded the increase in households over the past 10 years in the Borough.</p> <p>The Local Plan should also place greater emphasis on developing brownfield sites at higher densities, reusing vacant town centre buildings and tackling the waste of resources that is long term empty homes.</p> <p>We shouldn't be building on good quality, carbon soaking, agricultural land that forms the beautiful countryside that our residents enjoy in their leisure time.</p> <p>(redacted by admin) the AB15 site, this land is currently using for farming. And the field is extremely waterlogged, (redacted by admin) has been flooded on numerous occasions due to this. I do not feel that this land is suitable to build new homes on. I fear that it would only exacerbate the flooding issue as the new builds have on barleyfields Audley. A number of residents have commented on how flooding has since become an issue for them since these new builds next to their homes have been built. I do not wish for the same issue for us, whenever it rains the back of our garden becomes flooded, as does the field (redacted by admin). Building on this field would impact (redacted by admin) even further causing more flooded lawn and garden. (Photos attached).</p> <p>There is also protected wildlife living on this land, we have seen a few hedgehogs over the years living in the hedgerows bordering the field. I have also spotted hares at dusk. It is vital that we protect our wildlife and not destroy their homes, especially protected species.</p> <p>In addition our village cannot take the extra traffic that would come with this many new homes. There are no traffic calming measures, and the village is already massively overrun with vehicles especially at peak times. Church street in particular is too busy already and has become dangerous. With cars parked on double yellows, all car parks full and pedestrians trying to cross the roads with people driving too quickly and vision impaired by illegally parked cars. This would be worse with more people living in the local area using the same amenities. We have lived (redacted by admin) and in 10 years the traffic I feel has already doubled, it is much busier and much more dangerous than it was (redacted by admin)</p> <p>I fear that the added pressure on our doctors and dentist would also have a negative impact. We are already having to wait longer for appointments at the doctors, this would be much worse with more residents using the same health centre. There are residents in alsager waiting more than 4 weeks for an appointment, I do not wish for the people of Audley parish to be in the same situation.</p> <p>The dentist is already at capacity and not taking on new customers, they are also very difficult to get an appointment with.</p> <p>The traffic coming in and out of the village is dangerous, with many collisions and near misses coming on and off the a500. This again would be made much worse with more residents living in the parish.</p> <p>I strongly disagree building on green belt land, this green space provides a safe haven for nature and wildlife to thrive. It is our duty to protect our wildlife and their habitats. It is also good for mental well-being to have ample green spaces around us. We chose to (redacted by admin) here due to the green spaces available, the fresh air and the opportunity to exercise in the countryside and to teach (redacted by admin) about nature. To have green spaces ruined for housing that isn't actually needed would be devastating for both the wildlife and the residents who have the right to enjoy the countryside around us. There are ample sites in the surrounding areas which can be built on, with permission already granted. I would strongly urge the council to look in to those sites before destroying precious green space.</p> <p>The village is a semi rural village, and we take pride (redacted by admin), Audley and bignall end should be kept this way for all of the reasons mentioned above. Our small village really could not cope with increase in housing on top of the proposed warehouse space too. It simply does not have capacity to accommodate this.</p> <p>The local schools are also very busy too, and with only 1 nursery local to our parish I also fear that the pressure on these will be too high. They will not be able to keep up with the amount of children needing a place.</p> <p>We should also be supporting our local farmers and encouraging farm land to continue. I am astonished that this isn't something that the council would be putting as a priority. Sustainable farming whilst supporting the wildlife is far more important than building homes that are not needed.</p> <p>With the reasons the listed I would like to ask for the planning inspector to please remove this site from your local plan.</p>
<b>Comment ID</b>	NULLP703
<b>Order</b>	153

<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Pustkowski
<b>Consultee Given Name</b>	Naomi
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I am emailing to object to the proposed development on AB33.</p> <p>I do not believe the land to be sound or the reasons to develop justifiable for the below reasons.</p> <p>The overall NULBC housing numbers cannot be justified: The population of the Borough is falling (a 0.5% drop from 2011 to 2021) which suggests a lower Household forecast.</p> <p>The number of new dwellings built in the Borough in excess of the targets in previous years (32% over the target from the 2018-19 year to the 2020-21 year) and the excess in neighbouring authorities. People from Kidsgrove will live in new builds in Golden Hill, even though it's technically in Stoke, people from Audley will live the new builds in Alsager, even though it is Cheshire East and people from Baldwins Gate &amp; Loggerheads will live in new builds in Market Drayton, even though it's in Shropshire.</p> <p>NuLBC are applying a high growth strategy. They present no evidence that this will transpire. This is neither justified nor is it likely to be deliverable, therefore it is unsound.</p> <p>Housebuilding has exceeded the increase in households over the past 10 years in the Borough.</p> <p>The Local Plan should also place greater emphasis on developing brownfield sites at higher densities, reusing vacant town centre buildings and tackling the waste of resources that is long term empty homes.</p> <p>We shouldn't be building on good quality, carbon soaking, agricultural land that forms the beautiful countryside that our residents enjoy in their leisure time.</p> <p>The land on which has been proposed for housing is extremely waterlogged. I do not feel that this land is suitable to build new homes on. I fear that it would only exacerbate the flooding issue as the new builds have on barleyfields Audley. A number of residents have commented on how flooding has since become an issue for them since these new builds next to their homes have been built.</p> <p>In addition our village cannot take the extra traffic that would come with this many new homes. There are no traffic calming measures, and the village is already massively overrun with vehicles especially at peak times. Church street in particular is too busy already and has become dangerous. With cars parked on double yellows, all car parks full and pedestrians trying to cross the roads with people driving too quickly and vision impaired by illegally parked cars. This would be worse with more people living in the local area using the same amenities. We have (redacted by admin) and in 10 years the traffic I feel has already doubled, it is much busier and much more dangerous than it was (redacted by admin)</p> <p>I fear that the added pressure on our doctors and dentist would also have a negative impact. We are already having to wait longer for appointments at the doctors, this would be much worse with more residents using the same health centre. There are residents in alsager waiting more than 4 weeks for an appointment, I do not wish for the people of Audley parish to be in the same situation.</p> <p>The dentist is already at capacity and not taking on new customers, they are also very difficult to get an appointment with.</p> <p>The traffic coming in and out of the village is dangerous, with many collisions and near misses coming on and off the a500. This again would be made much worse with more residents living in the parish.</p> <p>I strongly disagree building on green belt land, this green space provides a safe haven for nature and wildlife to thrive. It is our duty to protect our wildlife and their habitats. It is also good for mental well-being to have ample green spaces around us. We chose to (redacted by admin) here due to the green spaces available, the fresh air and the opportunity to exercise in the countryside and to teach (redacted by admin) about nature. To have numerous green spaces ruined for housing that isn't actually needed would be devastating for both the wildlife and the residents who have the right to enjoy the countryside around us. There are ample sites in the surrounding areas which can be built on, with permission already granted. I would strongly urge the council to look in to those sites before destroying precious green space.</p> <p>The village is a semi rural village, and we take pride (redacted by admin), Audley and bignall end should be kept this way for all of the reasons mentioned above. Our small village really could not cope with this huge increase of housing on top of the proposed warehouse space too. It simply does not have capacity to accommodate this.</p> <p>The local schools are also very busy too, and with only 1 nursery local to our parish I also fear that the pressure on these will be too high. They will not be able to keep up with the amount of children needing a place.</p> <p>We should also be supporting our local farmers and encouraging farm land to continue. I am astonished that this isn't something that the council would be putting as a priority. Sustainable farming whilst supporting the wildlife is far more important than building homes that are not needed.</p>
<b>Comment ID</b>	NULLP818
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Pustkowski
<b>Consultee Given Name</b>	Naomi
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Hello</p> <p>I am emailing to object to the proposed development on site AB15.</p> <p>I do not believe that the plan is sound or justifiable, for the below reasons.</p> <p>The overall NULBC housing numbers cannot be justified: The population of the Borough is falling (a 0.5% drop from 2011 to 2021) which suggests a lower Household forecast.</p> <p>The number of new dwellings built in the Borough in excess of the targets in previous years (32% over the target from the 2018-19 year to the 2020-21 year) and the excess in neighbouring authorities. People from Kidsgrove will live in new builds in Golden Hill, even though it's technically in Stoke, people from Audley will live in the new builds in Alsager, even though it is in Cheshire East and people from Baldwins Gate &amp; Loggerheads will live in new builds in Market Drayton, even though it's in Shropshire.</p> <p>Housebuilding has exceeded the increase in households over the past 10 years in the Borough.</p> <p>The Local Plan should also place greater emphasis on developing brownfield sites at higher densities, reusing vacant town centre buildings and tackling the waste of resources that is long term empty homes.</p> <p>We shouldn't be building on good quality, carbon soaking, agricultural land that forms the beautiful countryside that our residents enjoy in their leisure time.</p> <p>(redacted by admin) this land is currently using for farming. And the field is extremely waterlogged, our garden has been flooded on numerous occasions due to this. I do not feel that this land is suitable to build new homes on. I fear that it would only exacerbate the flooding issue as the new builds have on barleyfields Audley. A number of residents have commented on how flooding has since become an issue for them since these new builds next to their homes have been built. I do not wish for the same issue for us, whenever it rains the back of our garden becomes flooded, as does the field behind our fence. Building on this field would impact our land even further causing more flooded lawn and garden. (Photos attached).</p> <p>There is also protected wildlife living on this land, we have seen a few hedgehogs over the years living in the hedgerows bordering the field. I have also spotted hares at dusk. It is vital that we protect our wildlife and not destroy their homes, especially protected species.</p> <p>In addition our village cannot take the extra traffic that would come with this many new homes. There are no traffic calming measures, and the village is already massively overrun with vehicles especially at peak times. Church street in particular is too busy already and has become dangerous. With cars parked on double yellows, all car parks full and pedestrians trying to cross the roads with people driving too quickly and vision impaired by illegally parked cars. This would be worse with more people living in the local area using the same amenities. We have lived in Audley since 2013 and in 10 years the traffic I feel has already doubled, it is much busier and much more dangerous than it was when we first came to live here.</p> <p>I fear that the added pressure on our doctors and dentist would also have a negative impact. We are already having to wait longer for appointments at the doctors, this would be much worse with more residents using the same health centre. There are residents in alsager waiting more than 4 weeks for an appointment, I do not wish for the people of Audley parish to be in the same situation.</p> <p>The dentist is already at capacity and not taking on new customers, they are also very difficult to get an appointment with.</p> <p>The traffic coming in and out of the village is dangerous, with many collisions and near misses coming on and off the a500. This again would be made much worse with more residents living in the parish.</p> <p>I strongly disagree building on green belt land, this green space provides a safe haven for nature and wildlife to thrive. It is our duty to protect our wildlife and their habitats. It is also good for mental well-being to have ample green spaces around us. We chose to live in Audley and raise a family here due to the green spaces available, the fresh air and the opportunity to exercise in the countryside and to teach our children about nature. To have green spaces ruined for housing that isn't actually needed would be devastating for both the wildlife and the residents who have the right to enjoy the countryside around us. There are ample sites in the surrounding areas which can be built on, with permission already granted. I would strongly urge the council to look in to those sites before destroying precious green space.</p> <p>The village is a semi rural village, and we take pride in where we live, Audley and bignall end should be kept this way for all of the reasons mentioned above. Our small village really could not cope with increase in housing on top of the proposed warehouse space too. It simply does not have capacity to accommodate this.</p> <p>The local schools are also very busy too, and with only 1 nursery local to our parish I also fear that the pressure on these will be too high. They will not be able to keep up with the amount of children needing a place.</p> <p>We should also be supporting our local farmers and encouraging farm land to continue. I am astonished that this isn't something that the council would be putting as a priority. Sustainable farming whilst supporting the wildlife is far more important than building homes that are not needed.</p> <p>With the reasons the listed I would like to ask for the planning inspector to please remove this site from your local plan.</p>
<b>Q10 File 1</b>	6389307
<b>Q10 File 2</b>	6389308
<b>Q10 File 3</b>	6389309
<b>Attachments</b>	<a href="#">1338486 Naomi Pustkowski .pdf</a>

Naomi Pustkowski 1.jpg  
NAomi Pustkowski 2.jpg



<b>Comment ID</b>	NULLP1282
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p><b>Previous Consultations</b></p> <p>National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.</p> <p>In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.</p> <p><b>Final Draft Local Plan Regulation 19 Consultation</b></p> <p>The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.</p> <p>In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.</p> <p><b>Housing and employment requirements</b></p> <p>Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.</p> <p>We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.</p> <p>As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.</p> <p>Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the</p>

scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

Sustainable transport

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?
- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: “The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?”

**STA Comments Summary**

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

**Infrastructure Delivery Plan (IDP)**

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.

T14 specifically mentions a “Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage.” It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.

We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

**Duty to Cooperate**

We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.

National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.

Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.

<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1286
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority</p>

and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.

In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

#### Previous Consultations

National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.

In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.

#### Final Draft Local Plan Regulation 19 Consultation

The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.

In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.

#### Housing and employment requirements

Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

#### Sustainable transport

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

#### Transport Evidence Base



Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?
- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: “The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?”

STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

Infrastructure Delivery Plan (IDP)

	<p>A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:</p> <p>1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme</p> <p>2. T14 to T20 schemes</p> <p>We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.</p> <p>T14 specifically mentions a "Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage." It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.</p> <p>We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.</p> <p>Duty to Cooperate</p> <p>We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.</p> <p>National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.</p> <p>Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.</p>
<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1281
<b>Order</b>	16
<b>Title</b>	Vision for the Borough
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Vision
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>Previous Consultations</p>



National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.

In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.

Final Draft Local Plan Regulation 19 Consultation

The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.

In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.

Housing and employment requirements

Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

Sustainable transport

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?

•Does this scenario include any committed and under-construction developments within the local plan area?

•What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable. Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: “The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?”

STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers’ contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

Infrastructure Delivery Plan (IDP)

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.

T14 specifically mentions a “Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage.” It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.

We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

Duty to Cooperate

	<p>We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.</p> <p>National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.</p> <p>Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.</p>
<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1285
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>Previous Consultations</p> <p>National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.</p> <p>In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.</p> <p>Final Draft Local Plan Regulation 19 Consultation</p> <p>The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.</p> <p>In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.</p> <p>Housing and employment requirements</p> <p>Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined</p>

using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

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Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

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- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?



Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: “The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?”

STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

Infrastructure Delivery Plan (IDP)

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.

T14 specifically mentions a “Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage.” It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.

We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

Duty to Cooperate

We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.

National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.

Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.

<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1280
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	National Highways

<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p><b>Previous Consultations</b></p> <p>National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.</p> <p>In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.</p> <p><b>Final Draft Local Plan Regulation 19 Consultation</b></p> <p>The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.</p> <p>In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.</p> <p><b>Housing and employment requirements</b></p> <p>Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.</p> <p>We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.</p> <p>As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.</p> <p><b>Policy SA1: Site Allocations</b> indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)</p> <p>In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.</p> <p><b>Sustainable transport</b></p> <p>We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM</p>



Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?
- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

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STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

Infrastructure Delivery Plan (IDP)

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.

T14 specifically mentions a "Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage." It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.

We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

Duty to Cooperate

We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.

National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.

Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.

<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1284
<b>Order</b>	92
<b>Title</b>	Policy IN4 Cycleways, Bridleways and Public Rights of Way
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN4
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular')</p>

which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

#### Previous Consultations

National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.

In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.

#### Final Draft Local Plan Regulation 19 Consultation

The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.

In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.

#### Housing and employment requirements

Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

#### Sustainable transport

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

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#### Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

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We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

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Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

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- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

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We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

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**STA Comments Summary**

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We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

**Infrastructure Delivery Plan (IDP)**

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.



	<p>T14 specifically mentions a “Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage.” It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.</p> <p>We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.</p> <p>Duty to Cooperate</p> <p>We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.</p> <p>National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.</p> <p>Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.</p>
<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1288
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>“The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.”</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>Previous Consultations</p> <p>National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.</p> <p>In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.</p> <p>Final Draft Local Plan Regulation 19 Consultation</p>

The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced. In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.

#### Housing and employment requirements

Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

#### Sustainable transport

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

#### Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

#### Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?
- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a



detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: “The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?”

STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.

We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.

Infrastructure Delivery Plan (IDP)

A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:

1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme
2. T14 to T20 schemes

We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.

T14 specifically mentions a “Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage.” It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.

We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

Duty to Cooperate

We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.

National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with.

	<p>We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.</p> <p>Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.</p>
<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1283
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q6 Details</b>	<p>Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)</p> <p>National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.</p> <p>National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.</p> <p>In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:</p> <p>"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."</p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>Previous Consultations</p> <p>National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.</p> <p>In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.</p> <p>Final Draft Local Plan Regulation 19 Consultation</p> <p>The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.</p> <p>In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.</p> <p>Housing and employment requirements</p> <p>Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.</p> <p>We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.</p> <p>As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3%</p>

to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

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'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

**Transport Evidence Base**

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

**Strategic Transport Assessment (document reference ED011)**

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

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Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

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Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

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We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.

Duty to Cooperate

We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.

National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.

Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.

<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>
<b>Comment ID</b>	NULLP1287
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	National Highways
<b>Consultee Position</b>	Assistant Spatial Planner
<b>Consultee Family Name</b>	Pyner
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE2



## Q6 Details

Newcastle-Under-Lyme Local Plan Review - Regulation 19 Consultation (Final Draft)

National Highways welcomes the opportunity to provide comments on the Final Draft Local Plan consultation (Regulation 19) prepared for Newcastle-Under-Lyme Borough Council, which is expected to cover the plan period up to 2040.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to this consultation, National Highways' principal interest is ensuring the safe and efficient operation of the SRN in the area, notably the M6, A50 and A500 network which routes through the Local Plan boundary.

In responding to Local Plan consultations, we have regard to the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of local plans. Paragraph 28 of the Circular sets out that:

"The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan."

In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

**Previous Consultations**

National Highways was consulted during the Regulation 18 consultation in August 2023. The Regulation 18 identified a minimum requirement of 7,160 dwellings (358 per year) and 69 hectares of employment land to be delivered during the plan period between 2020 and 2040. It also included potential sites for allocation, and we provided an indication of the potential sites that were expected to have traffic and boundary impacts on the SRN.

In May 2024, National Highways was consulted to provide recommendations for the Infrastructure Delivery Plan preparation, where we provided comments on the infrastructure requirement.

**Final Draft Local Plan Regulation 19 Consultation**

The Final Draft Local Plan Regulation 19 includes locally specific policies and strategic / non-strategic site allocations to meet housing and employment needs across the Newcastle-Under-Lyme area for the plan period of up to 2040. Once adopted, this Local Plan will replace the policies in the Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009) and the saved policies of the Newcastle-Under-Lyme Local Plan (adopted 2003). Appendix 2 of the Local Plan consultation document outlines the list of previously adopted policies that will be retained or replaced.

In principle, National Highways supports the vision and objectives set out in the Regulation 19 Draft Local Plan which aim to deliver the growth in a sustainable manner.

**Housing and employment requirements**

Based on our review of the Regulation 19 consultation, we note that the Final Draft Local Plan outlines a minimum requirement to deliver 63 hectares of employment land and 8,000 dwellings (400 dwellings per annum) over the plan period of up to 2040 as stated in the 'Policy PSD1: Overall Development Strategy'. We welcome that the housing and employment requirement have primarily been determined using a Housing and Economic Development Needs Assessment (HEDNA) in 2024, which in this case is expected to provide a higher housing demand when compared against the Government's standard method.

We acknowledge that a Sustainability Appraisal (SA) process has been undertaken to evaluate the different growth options considered, assess the impacts and identify the residual effects based on the social, economic and environmental parameters.

As outlined in Table 2 of the Final Draft a total of 8,663 dwellings are planned to be delivered over the plan period of up to 2040 to meet housing demands. This also includes a supply buffer of around 8.3% to address any potential delivery challenges. We acknowledge that the supply also factors in the windfall allowance estimated based on the Council's Strategic Housing Land Availability Assessment (SHLAA), historical trends, and future projections.

Policy SA1: Site Allocations indicates that a significant portion of the housing supply will be delivered through strategic allocations. When comparing the allocation sites included in the Regulation 19 consultation against those set out in the Regulation 18 consultation, we note some minor changes in the scale of growth at individual sites, with a few sites being removed and others added. However, the total housing growth from all strategic allocations remains at 4,512 dwellings. The table below outlines these changes (tables included in the attachment)

In the case of employment supply, we note that AB2 (Land at M6 Junction 16) and KL15 (Land at Barkers Wood, Keele) are key strategic sites contributing significantly to meet the employment needs.

**Sustainable transport**

We acknowledge that the Final Draft Local Plan has focussed on decarbonisation policies such as 'Policy CRE 1: Climate change' and 'Policy CRE 2: Renewable energy' to address climate change impacts by reducing carbon emissions. This also includes developing energy-efficient buildings, designing to BREEAM Excellent standards, optimising water use, adopting water conservation measures, and utilising renewable or low-carbon energy sources.

'Policy IN2: Transport and Accessibility' emphasises that new developments must provide access through sustainable transport modes to protect the integrity of the highway network. The Council will work with developers to ensure that the proposals contribute to a transport network that is accessible, efficient, and safe. We support this policy and acknowledge that developments likely to generate significant traffic will be required to produce Transport Assessments and Travel Plans, in accordance with the requirements

set out. We appreciate that focus is also given to developments that facilitate sustainable movement of freight traffic.

'Policy IN4: Cycleways, Bridleways, and Public Rights of Way' highlights the importance of enhancing walking, cycling, and public transport facilities within the Borough.

We welcome these policies and note that these align with the expectations set out in the National Planning Policy Framework and National Highways' Net Zero Strategy.

Transport Evidence Base

Considering the scale and location of the allocations included in the Draft Final Local Plan, we expect impacts on the SRN in the area either independently or cumulatively.

Strategic Transport Assessment (document reference ED011)

We acknowledge that a Strategic Transport Assessment (STA) dated July 2024 has been prepared using the North Staffordshire Multi-Modal (NSMM) transport model to assess the likely traffic impacts of the site allocations proposed in the Regulation 19 consultation. We note that the model has been run for the following five scenarios in the forecast year of 2040.

Based on our review of the STA, we have the following comments to make:

Section 4.5 of the STA states that while the model emphasises the use of pre/post-COVID data, we note that accident data for the years 2018-2022 includes COVID data with relatively lower traffic flows and possibly fewer accidents. How has the impact of COVID been taken into account?

Section 5.3 of the STA states that the 2015 NSMM model is overestimating the flows by 26-28% when compared against 2022/23 observed WebTRIS data. It also notes that only 15-35% of counts pass in this validation exercise. Despite this shortcoming, model forecasts for 2040 were proposed to be used to inform future testing, which National Highways agreed to as it presents the worst-case scenario with overestimation of the traffic.

Section 7 provides details of the reference case model development, but note that finer details of the method applied are missing. We therefore have the following queries relating to this section:

- Does this scenario include constraining other local authorities to NTEM/TEMPro?
- Does this scenario include any committed and under-construction developments within the local plan area?
- What is the background growth percentage between the base year and the forecast year 2040?

Regarding Figure 7-1, we are unable to find the basis for changing the junction delay definitions for slight, moderate, and severe delays from what was mentioned in the minutes of the meeting dated 15th May 2024. At present, delays of up to 3 minutes at junctions are reported as slight which is arguable.

Based on the model outcomes, improvement measures to enhance public transport connectivity and infrastructure schemes on the local highway network are proposed in the STA. We also note that a detailed junction assessment will be undertaken for M6 J16 using a VISSIM model to accurately assess the traffic impacts of the AB2 allocation.

Regarding Section 8.3.2, bullet 1, we interpret that the new junction is the access to site AB2. Thus, we are surprised that the design of this new junction would still lead to 120-180 seconds of delays in the PM. A new access arrangement should work without that much stress.

We request that a summary table with delays (absolute numbers in seconds) at each of the approaches be prepared and shared with National Highways for M6 J16 and the new junction on A500 for site AM2. This is so we can understand the changes in delays between the base, reference case, and proposed scenarios.

We request that the basis for the 10% reduction in car users for the area around site AB2 set out within Section 8.6.6.1 be supported by further evidence.

We also request further details on how much total demand (in PCUs or vehicles) has been removed from the original matrix. Has a preliminary assessment been undertaken on the frequency of bus service that would be required to cater to that demand during peak hours to verify that this is a feasible option?

Regarding Section 8.6.3, while we do not have an issue with the bespoke approach to testing M6 J16 within VISSIM, considering that the NSMM is overestimating the traffic, the use of incremental addition of the difference from the NSMM may lead to an underestimation of traffic at this junction due to large delays in the NSMM reference case scenario. There is a possibility that any additional traffic from the AB2 site may divert to local or unrealistic routes within NSMM.

We therefore request that traffic flow distribution Select Link Analysis plots from site AB2 be shared with National Highways to verify that the routes assigned in the model are reasonable before being used for incremental addition for microsimulation assessment.

We also request that observed base and modelled reference case data be presented in a similar format as Table 8-6 for National Highways to understand the absolute traffic growth at each of the approaches.

National Highways Previous comments

While we are happy with the suggested incremental change in flow and delays analysis for 2040 forecast year models, we must establish a robust do – minimum reference case scenario developed using the base year model.

We note that our previous query dated May 2024 remains unanswered: "The further turning count comparison tables for the M6 J16 model are appreciated and provides comfort that many movements (particularly the A500 East approach) match the 2015 model. However the turning proportions provided for the M6 South to A500 East movement are of concern as these look significantly different to those that were modelled. National Highways would like to understand if there are any explanations of why these differences have occur and particularly why the model identifies such low percentage of car movements?"

STA Comments Summary

In summary, the modelling work to date is based on the NSMM model, which was previously approved by the DfT for other schemes. However, present-day validation using 2022/23 data shows that the model is overestimating traffic and not validating well. Hence, a bespoke approach is applied to assessing M6 J16, while the rest of the strategic assessment uses the forecast 2040 NSMM model which is still believed to be the best tool available. Analysis provided shows that parts of the A500 and junctions along it will be stressed by 2040 and that the level of stress will increase with the local plan. Strategic allocation sites tested will lead to some congestion but this would not lock out the network. The STA and IDP mention the possibility of developers' contributions for various infrastructure schemes including a new bus service



	<p>along site AB2 among others that could potentially bring congestion levels down to a more comparable level with the reference case scenario, which should be acceptable.</p> <p>We request responses to our queries above but are hopeful that the Local Plan can work with some support from the developers to mitigate any impact on the SRN.</p> <p>Infrastructure Delivery Plan (IDP)</p> <p>A total of 28 transport development schemes are listed in Table A.1 of Appendix A of the IDP to enhance the transport network and promote sustainable transport. The schemes that are of interest to National Highways are:</p> <ol style="list-style-type: none"> <li>1. T9 (improvements between M6 J13 and J15) - part of the RIS 2 scheme</li> <li>2. T14 to T20 schemes</li> </ol> <p>We note that the finalisation of these schemes is subject to undertaking detailed junction capacity assessments. We appreciate that the list of potential allocations that are likely to impact the SRN has been included.</p> <p>T14 specifically mentions a "Potential mitigation scheme involving widening and an additional lane at the gyratory on M6 J16. VISSIM modelling work is currently ongoing, and the need for any potential mitigation measures can be confirmed after the completion of a detailed capacity assessment as part of the planning application stage." It should be noted that there is no confirmed scheme from National Highways perspective at the moment, and we seek confirmation as to whether such a scheme is included in the Local Plan assessment within Scenario 5.</p> <p>We note that the funding mechanism to implement these mitigation schemes including T14 will likely be through developer funded Section 278 agreements. Considering that there could be cumulative impacts from different allocations in the area, a Section 278 agreement is likely to result in a piecemeal approach to the delivery of the improvement works. We would welcome some clarity on why a Section 278 agreement is preferred over a Section 106 agreement for the funding mechanism in this case.</p> <p>Duty to Cooperate</p> <p>We note that a Duty to Cooperate Interim Statement of Compliance has been submitted as part of the evidence base alongside the Final Draft Local Plan. We commend the Council's approach to collaborating with neighbouring local authorities, stakeholders, and other bodies to address issues related to local authority boundaries. This collaborative effort will help ensure that all parties' interests are considered and that a comprehensive solution is developed.</p> <p>National Highways is committed to working with Newcastle-Under-Lyme Council to develop and draft a Statement of Common Ground (SoCG) to address any strategic cross-boundary issues and reach an agreement on how the traffic impacts from the allocations identified in the Local Plan are to be dealt with. We understand that a final version of the Duty to Cooperate will be prepared to support the submission version by December 2024.</p> <p>Once again, National Highways appreciates the opportunity to comment on the Final Draft Local Plan Regulation 19 consultation and looks forward to working collaboratively with the Council to support the development and adoption of the Local Plan for Newcastle-Under-Lyme.</p>
<b>Attachments</b>	<a href="#">1364594 National Highways.pdf</a>

<b>Comment ID</b>	NULLP1421
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Quinn
<b>Consultee Given Name</b>	Christine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1422
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Quinn
<b>Consultee Given Name</b>	Christine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol>

The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which

	<p>suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Red Street cannot withstand anymore traffic it is dangerous now!! Deans Lane is a very busy road with no footpath and a dangerous junction entering onto Talke Road. Cars parked on Talke Road cause it to be a danger when bigger vehicles use the road or when the A34 is blocked. Bells Hollow is a single track road that the amount of cars that use it, it should be made one way now!! Cars speed through Red Street causing a potential fatality to other road users and pedestrians Red Street doesn't have an infrastructure to withstand additional houses been built. If every house has an estimated 2 or 3 children that makes 3000 more and estimated 1400 more cars. I strongly oppose this. Someone should come and study this road at 4:30pm onwards everyday.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP872
<b>Order</b>	199
<b>Title</b>	Policy NC13 Land West of Bullockhouse Road, Harriseahead
<b>Consultee Family Name</b>	Ramsbottom
<b>Consultee Given Name</b>	Adrian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	NC13
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	SOUNDNESS - IN REGARD TO NC13, THE TRAFFIC SURVEY WAS NOT DONE AT THE SITE, BUT FURTHER UP THE ROAD ON CHAPEL ROAD. - THERE DOES NO APPEAR TO HAVE BEEN A DETAILED ENVIRONMENTAL SURVEY ON NC13 - AN ADEQUATE SEARCH FOR BROWNFIELD SITES AND EMPTY HOUSES IN THE NEWCASTLE AREA DOES NOT APPEAR TO HAVE BEEN DONE.
<b>Q7 Modification</b>	PROPER TRAFFIC AND ENVIRONMENTAL SURVEYS TO BE CARRIED OUT THE USE OF MORE LAND FROM BROWNFIELD SITES AND EMPTY/DERELICT PROPERTIES.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP877
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Ramsbottom
<b>Consultee Given Name</b>	Adrian
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	NOT LEGALLY OR PROCEDUALLY COMPLIANT - THE LAW REGARDING THE REMOVAL OF GREENFIELD SITE STATUS HAS CHANGED WITH THE NEW LABOUR GOVERNMENT
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP875
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Ramsbottom
<b>Consultee Given Name</b>	Adrian
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	NOT LEGALLY OR PROCEDUALLY COMPLIANT - CONSULTATION PROCESS HAS BEEN INADEQUATE, AND HAS NOT ALLOWED THE LOCAL COMMUNITY TO EASILY LIAISE WITH MEMBERS OF THE PLANNING OFFICE. - THE INTERNET PORTAL HAS BEEN DIFFICULT TO USE, ESPECIALLY FOR THE ELDERLY AND NON COMPUTER LITERATE
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1465
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Ratcliffe
<b>Consultee Given Name</b>	Jayne
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p>



	<p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1464
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Ratcliffe
<b>Consultee Given Name</b>	Jayne
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this</p>

	<p>fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP598
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Reeves
<b>Consultee Given Name</b>	susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Good afternoon,</p> <p>In addition to the objection just lodged against the unnecessary warehouse of AB2, I would also like to lodge objections about</p> <p>AB12 land east of Diglake Street</p> <p>AB15 land north of Vernon Avenue</p> <p><b>AB15 land north of Vernon Avenue</b></p> <p>The estate is already busy &amp; the roads are in a shocking state. Vernon Avenue is accessed off Wereton Road, which is already narrow &amp; very difficult to pass. Adding more houses into the</p> <p>There is no capacity to extend the GP Practice, or the schools, all of which are at capacity.</p> <p>The village of Audley has limited car parking, and a problem with car parking on the yellow lines &amp; the zigzag white lines at the zebra crossings. Adding hundreds of new homes, more people &amp; more cars will make this problem worse, not better.</p> <p>I did not see any feasible plans to deal with the inevitable traffic issues should any houses be built.</p> <p>The surrounding villages all have similar issues with parked cars &amp; limited passing room.</p> <p>Pinch points are</p> <p>Bignall End - Ravens Lane (all the way from the top, at the shops all the way down)</p> <p>Bignall End - Great Oak Road/Hullocks Pool Road &amp; Cross Lane – lanes that all have large sections of single width road, making it very difficult/dangerous to pass</p> <p>Audley – Church Street (around the shops, parking on the road, double yellows, zigzags)</p> <p>Audley - Chester Road, no room/very limited room to pass due to parked car</p> <p>Audley - Wereton Road, no room to pass due to parked cars (nearly always have to reverse to allow passing)</p> <p>Miles Green – Heathcote Road &amp; Station Road junction</p> <p>Alsagers Bank – High Street, at the top (near the Gresley Arms pub &amp; to the Scot Hay Road) &amp; then most of the way down the bank (to the Railway Pub)</p> <p>If more houses are built, more people will be on these roads, making difficult roads more dangerous for drivers, pedestrians &amp; cyclists.</p> <p>Alsager &amp; Sandbach have both had recent mass house building projects, and both now have an issue with traffic.</p> <p>Houses have been built, but no infrastructure put in place to deal with the extra cars.</p> <p>These are both towns I now avoid.</p> <p>I object to these two sites &amp; think they should be removed from the local plan.</p>
<b>Comment ID</b>	NULLP597
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Reeves
<b>Consultee Given Name</b>	susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>Good afternoon,</p> <p>In addition to the objection just lodged against the unnecessary warehouse of AB2, I would also like to lodge objections about</p> <p>AB12 land east of Diglake Street</p> <p>AB15 land north of Vernon Avenue</p> <p><b>AB12 land east of Diglake Street</b></p> <p>Diglake Street – there is no suitable access to this site, either from the bad bend on Raven's Lane, nor at the bottom of Diglake street.</p>

	<p>There is also flooding of the field from Brieley Book. I understand cottages on the corner of Great Oak Road &amp; Bignall End Road already suffer from flooded cellars, as do houses in Hope Street, Diglake street, Edward Street &amp; Albert Street.</p> <p>Diglake Street &amp; Albert Street are already over parked &amp; very narrow. The use of these roads during construction is not feasible, neither is the use of the roads for additional cars if houses were to be built. The same applies to the bend on Ravens Lane, which was also suggested as an entrance to the site. There is no capacity to extend the GP Practice, or the schools, all of which are at capacity.</p> <p>The village of Audley has limited car parking, and a problem with car parking on the yellow lines &amp; the zigzag white lines at the zebra crossings. Adding hundreds of new homes, more people &amp; more cars will make this problem worse, not better.</p> <p>I did not see any feasible plans to deal with the inevitable traffic issues should any houses be built.</p> <p>The surrounding villages all have similar issues with parked cars &amp; limited passing room.</p> <p>Pinch points are</p> <p>Bignall End - Ravens Lane (all the way from the top, at the shops all the way down)</p> <p>Bignall End - Great Oak Road/Hullocks Pool Road &amp; Cross Lane – lanes that all have large sections of single width road, making it very difficult/dangerous to pass</p> <p>Audley – Church Street (around the shops, parking on the road, double yellows, zigzags)</p> <p>Audley - Chester Road, no room/very limited room to pass due to parked car</p> <p>Audley - Wereton Road, no room to pass due to parked cars (nearly always have to reverse to allow passing)</p> <p>Miles Green – Heathcote Road &amp; Station Road junction</p> <p>Alsagers Bank – High Street, at the top (near the Gresley Arms pub &amp; to the Scot Hay Road) &amp; then most of the way down the bank (to the Railway Pub)</p> <p>If more houses are built, more people will be on these roads, making difficult roads more dangerous for drivers, pedestrians &amp; cyclists.</p> <p>Alsager &amp; Sandbach have both had recent mass house building projects, and both now have an issue with traffic.</p> <p>Houses have been built, but no infrastructure put in place to deal with the extra cars.</p> <p>These are both towns I now avoid.</p> <p>I object to these two sites &amp; think they should be removed from the local plan.</p>
<b>Comment ID</b>	NULLP599
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Reeves
<b>Consultee Given Name</b>	susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>AB2 - land at Junction 16, M6 - objection to warehouse - Appendix 7 - final draft Local Plan - Audley Local Parish</p> <p>Good afternoon,</p> <p>As a local resident living in Bignall End I wish to lodge my objections to the proposed warehouse project at J16 of the M6.</p> <p>I consider this proposal to be unsound &amp; unjustified.</p> <p>I understand the size of the site to be out of proportion for the employment needs of the local area.</p> <p>I do not think it is practical to encourage thousands of people in cars to travel to the site for employment, from a volume of traffic perspective and an environment point of view.</p> <p>The local roads can barely cope with the level of traffic already on the roads, but bring thousands of additional cars in for work (&amp; the proposed new houses) and it will be unbearable.</p> <p>Lorries and people already use Bignall End and Audley as a short cut to join the A500, for the north bound M6, because the queues for the Junction 16 of the M6 start well before the Audley/Alsager junctions, to cut part of the queue out.</p> <p>I know the traffic will be encouraged to use the junction off the M6, but, in all honesty who will sit in traffic, wasting their own time, pumping out fumes, when there is an service/emergency access route.</p> <p>The lanes will become rat runs.</p> <p>I know car sharing and cycling will be encouraged, but up and down this very hilly area, in the dark, on wet &amp; cold mornings, people will use their cars, &amp; will use the emergency access routes.</p> <p>Is this warehousing even needed?</p> <p>I doubt it. There is already an employment park in Newcastle under Lyme, (Lymedale), there is also the Park House drive estates, extensive &amp; to both sides of the A34.</p>

	<p>There is also the Chatterley Whitefield and Peacock Hay Road development. Not in Newcastle under Lyme, but very close proximity is the huge development at Radway Green in Alsager (also using the Junction 16 on the M6) &amp; the Crewe David Whitby Way, all of which will be using the M6.</p> <p>The screen shots below are the currently available industrial units to let on the Peacock Hay Road Industrial development (top) &amp; the Radway Green development (bottom).</p> <p>These will be operational very shortly, and when occupied, will increase the heavy traffic on the already busy local roads, and the stretch of the A34, A500 &amp; M6.</p> <p>When these sites are operational, the need for local employment will be reduced further, to what is already a low unemployment rate, reducing the 'need' of AB2 further.</p> <p>If the green belt is lost to a development it will never be greenbelt again.</p> <p>If it's lost to a development that isn't even necessary, that would be a crime against nature &amp; the people of the borough.</p> <p>I also understand (BBC news 23/07/24) that the rail network won't be able to cope with the existing numbers of travellers now HS2 has been scrapped north of Birmingham on the North West line.</p> <p>HS2 trains won't be able to stop of Crewe now, as the funding has been pulled, Crewe train station is no longer getting an upgrade to extend the platforms (as the carriages are bigger, to accommodate the same number of passengers in the larger seats).</p> <p>The rail network were advising people either to travel at non-peak times, or use other methods of transport to travel between Birmingham &amp; Manchester, because the number of people it can carry will be reduced. The rail network is pushing people back onto the roads on this stretch of motorway.</p> <p>If you want to see the effects of poor planning of a large industrial area, take a look at Middlewich &amp; Winsford. Winsford has an enormous employment / industrial estate, yet the town is dead, despite all the jobs/employment.</p> <p>There is just traffic. Lots of traffic. Middlewich unfortunately bears the brunt of it, as the employees &amp; the lorries struggle to get through a T junction set of lights when traveling towards Junction 18 of the M6.</p> <p>I consider the site to be unsuitable &amp; the development to be unnecessary.</p> <p>Also to be considered is the loss of green belt land, food security, wildlife &amp; accessible green spaces, effects of additional pollution to the area &amp; the health of locals</p>
<b>Q10 File 1</b>	6387691
<b>Q10 File 2</b>	6387692
<b>Attachments</b>	<a href="#">Susan Reeves 1.png</a> <a href="#">Susan Reeves 2.png</a>

<b>Comment ID</b>	NULLP1163
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Reynolds
<b>Consultee Given Name</b>	Jacqueline
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>- I think AB2 has not been thought through short term and definitely not long term</p> <p>- Beginning with 4.5 accident data analysis. It shows accident roadmaps breakdown being a greater total of collisions for AB2 plus higher being serious one also. These figures will be higher with volume of traffic increasing in particular within the vicinity of AB2 and HGV's increasing</p> <p>- To remove 80 hectares of good agricultural land/ greenbelt is so short sighted. We need to encourage home grown produce for the future which will bring employment and job satisfaction constructing warehousing which is becoming more automated as we speak will not increase employment long term. Encouraging business opportunities with companies to bring growth involving technology, apprenticeships, engineering is where we need to aspire in a world market. We need to be encouraging entrepreneurs not half empty warehouses for goods brought from abroad.</p> <p>- The developer has indicated the development site would include a funded bus route. How long would the developer continue funded such an enterprise. It would not continue for the foreseeable future no matter what is said Therefore increasing private cars for said workforce. There is already heavy congestion on the M6 around Junction 16 which impacts on the A500 This development would increase congestion even more impacting on site access on and off road an traffic flow.</p> <p>- Observed date shows traffic congestion along the A500 eastbound approach (M6 J16) with decreased speeds (0-10mph AM) (10 mph PM)</p> <p>-Access proposals with (emergency) via Barthomley Rd is totally <u>unfeasible</u> Anyone familiar with Barthomley Rd understands majority of the road is one track or small vehicles can just about pass through. Living on said road delivery vehicles (not large) block the road and oncoming traffic are unable to pass. Large vehicles find it difficult as the narrowness and oncoming traffic is hazardous at any time with a bend in the road is <u>most</u> unwise, with HGVs impossible. I'm sure an alternate plan will be forthcoming once a site visit by all involved will be done</p> <p>- AB2 I have already mentioned previously present site sites around the area. In particular Radway Green which still has vacant units with access to the M6 from J16</p>
<b>Q7 Modification</b>	Remove AB2



<b>Comment ID</b>	NULLP914
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Rhodes
<b>Consultee Given Name</b>	Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>To whom it may concern,</p> <p>As with all previous responses I sincerely hope that all comments are read in full, and are truly taken into consideration in respect of proposed plans. I fear this is just a tick box exercise and that decisions have already been made.</p> <p>What makes this more difficult is, I like many people who have responded numerous times just wonder is there any point.</p> <p>Unlike the last response I sent I have not had the time to view the full and extensive document, therefore, this will be bullet points of objections/concerns and suggestions of how we can better make use of this land if it needs to be 'developed' at all.</p> <p>These proposed residential sites are in greenbelt, rather than destroying these areas we should be encouraging open spaces for wildlife and the health and wellbeing of existing residents.</p> <p>These sites especially AB12 will only put more pressure on the small main road (Ravens lane) that is already populated with too many cars-now parked on both sides of the road as the elderly members of the community move (varied reasons) from terraced houses to be replaced by families with as many as 3 or 4 cars-making it difficult for large farm machinery and HGV to pass, destroying roads which are rarely repaired.</p> <p>This will alter the very fabric of our community putting extra pressures on already stretched local services: doctors, dentists, village parking, schools and public transport- NB a major link route being discontinued only in the last couple of years - reducing the access to wider services for many.</p> <p>Whilst I understand and appreciate there is a need for more housing as the population rises, however, maybe we need to consider as a country better management of our borders and who we accept into the country - possibly using a well structured and practiced method such as Australia.</p> <p>Also when building new houses anywhere there needs to be more thought and space allocated to off road parking.</p> <p>There are many brownfields sites around Newcastle &amp; Stoke that could be effectively utilised if only councils worked together.</p> <p>A suggestion of how we as a community could instead work towards being fit for the future and carbon neutral; these identified resident areas could instead be large charging parks for electric vehicles that could be accessed and used by all local residents to conform with government plans moving forward.</p> <p>There are so many terraced houses it will be impossible to manage this locally in the future if solutions are not considered now!</p> <p>In respect of AB2 surely there can be no further requirement for 'warehousing' - just look around the area.</p> <p>This would destroy access to the country side, significant wildlife areas and turn Stoke into warehouse central.</p> <p>Instead; wind turbines or solar fields would mean that the area could still be used but would benefit the national grid.</p>
<b>Comment ID</b>	NULLP912
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Rhodes
<b>Consultee Given Name</b>	Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>To whom it may concern,</p> <p>As with all previous responses I sincerely hope that all comments are read in full, and are truly taken into consideration in respect of proposed plans. I fear this is just a tick box exercise and that decisions have already been made.</p> <p>What makes this more difficult is, I like many people who have responded numerous times just wonder is there any point.</p> <p>Unlike the last response I sent I have not had the time to view the full and extensive document, therefore, this will be bullet points of objections/concerns and suggestions of how we can better make use of this land if it needs to be 'developed' at all.</p> <p>These proposed residential sites are in greenbelt, rather than destroying these areas we should be encouraging open spaces for wildlife and the health and wellbeing of existing residents.</p> <p>These sites especially AB12 will only put more pressure on the small main road (Ravens lane) that is already populated with too many cars-now parked on both sides of the road as the elderly members of the community move (varied reasons) from terraced houses to be replaced by families with as many as</p>

	<p>3 or 4 cars-making it difficult for large farm machinery and HGV to pass, destroying roads which are rarely repaired.</p> <p>This will alter the very fabric of our community putting extra pressures on already stretched local services: doctors, dentists, village parking, schools and public transport- NB a major link route being discontinued only in the last couple of years - reducing the access to wider services for many.</p> <p>Whilst I understand and appreciate there is a need for more housing as the population rises, however, maybe we need to consider as a country better management of our borders and who we accept into the country - possibly using a well structured and practiced method such as Australia.</p> <p>Also when building new houses anywhere there needs to be more thought and space allocated to off road parking.</p> <p>There are many brownfields sites around Newcastle &amp; Stoke that could be effectively utilised if only councils worked together.</p> <p>A suggestion of how we as a community could instead work towards being fit for the future and carbon neutral; these identified resident areas could instead be large charging parks for electric vehicles that could be accessed and used by all local residents to conform with government plans moving forward.</p> <p>There are so many terraced houses it will be impossible to mange this locally in the future if solutions are not considered now!</p> <p>In respect of AB2 surely there can be no further requirement for 'warehousing' - just look around the area.</p> <p>This would destroy access to the country side, significant wildlife areas and turn Stoke into warehouse central.</p> <p>Instead; wind turbines or solar fields would mean that the area could still be used but would benefit the national grid.</p> <p>I understand the final date for submission of comments is tomorrow 7/10.</p> <p>Please confirm receipt of comments.</p> <p>Regards,</p> <p>Mrs S L Rhodes</p> <p>(redacted by admin)</p>
<b>Comment ID</b>	NULLP913
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Rhodes
<b>Consultee Given Name</b>	Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>To whom it may concern,</p> <p>As with all previous responses I sincerely hope that all comments are read in full, and are truly taken into consideration in respect of proposed plans. I fear this is just a tick box exercise and that decisions have already been made.</p> <p>What makes this more difficult is, I like many people who have responded numerous times just wonder is there any point.</p> <p>Unlike the last response I sent I have not had the time to view the full and extensive document, therefore, this will be bullet points of objections/concerns and suggestions of how we can better make use of this land if it needs to be 'developed' at all.</p> <p>These proposed residential sites are in greenbelt, rather than destroying these areas we should be encouraging open spaces for wildlife and the health and wellbeing of existing residents.</p> <p>These sites especially AB12 will only put more pressure on the small main road (Ravens lane) that is already populated with too many cars-now parked on both sides of the road as the elderly members of the community move (varied reasons) from terraced houses to be replaced by families with as many as 3 or 4 cars-making it difficult for large farm machinery and HGV to pass, destroying roads which are rarely repaired.</p> <p>This will alter the very fabric of our community putting extra pressures on already stretched local services: doctors, dentists, village parking, schools and public transport- NB a major link route being discontinued only in the last couple of years - reducing the access to wider services for many.</p> <p>Whilst I understand and appreciate there is a need for more housing as the population rises, however, maybe we need to consider as a country better management of our borders and who we accept into the country - possibly using a well structured and practiced method such as Australia.</p> <p>Also when building new houses anywhere there needs to be more thought and space allocated to off road parking.</p> <p>There are many brownfields sites around Newcastle &amp; Stoke that could be effectively utilised if only councils worked together.</p> <p>A suggestion of how we as a community could instead work towards being fit for the future and carbon neutral; these identified resident areas could instead be large charging parks for electric vehicles that could be accessed and used by all local residents to conform with government plans moving forward.</p> <p>There are so many terraced houses it will be impossible to mange this locally in the future if solutions are not considered now!</p> <p>In respect of AB2 surely there can be no further requirement for 'warehousing' - just look around the area.</p> <p>This would destroy access to the country side, significant wildlife areas and turn Stoke into warehouse central.</p>

	Instead; wind turbines or solar fields would mean that the area could still be used but would benefit the national grid.
<b>Comment ID</b>	NULLP915
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Rhodes
<b>Consultee Given Name</b>	Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>To whom it may concern,</p> <p>As with all previous responses I sincerely hope that all comments are read in full, and are truly taken into consideration in respect of proposed plans. I fear this is just a tick box exercise and that decisions have already been made.</p> <p>What makes this more difficult is, I like many people who have responded numerous times just wonder is there any point.</p> <p>Unlike the last response I sent I have not had the time to view the full and extensive document, therefore, this will be bullet points of objections/concerns and suggestions of how we can better make use of this land if it needs to be 'developed' at all.</p> <p>These proposed residential sites are in greenbelt, rather than destroying these areas we should be encouraging open spaces for wildlife and the health and wellbeing of existing residents.</p> <p>These sites especially AB12 will only put more pressure on the small main road (Ravens lane) that is already populated with too many cars-now parked on both sides of the road as the elderly members of the community move (varied reasons) from terraced houses to be replaced by families with as many as 3 or 4 cars-making it difficult for large farm machinery and HGV to pass, destroying roads which are rarely repaired.</p> <p>This will alter the very fabric of our community putting extra pressures on already stretched local services: doctors, dentists, village parking, schools and public transport- NB a major link route being discontinued only in the last couple of years - reducing the access to wider services for many.</p> <p>Whilst I understand and appreciate there is a need for more housing as the population rises, however, maybe we need to consider as a country better management of our borders and who we accept into the country - possibly using a well structured and practiced method such as Australia.</p> <p>Also when building new houses anywhere there needs to be more thought and space allocated to off road parking.</p> <p>There are many brownfields sites around Newcastle &amp; Stoke that could be effectively utilised if only councils worked together.</p> <p>A suggestion of how we as a community could instead work towards being fit for the future and carbon neutral; these identified resident areas could instead be large charging parks for electric vehicles that could be accessed and used by all local residents to conform with government plans moving forward.</p> <p>There are so many terraced houses it will be impossible to mange this locally in the future if solutions are not considered now!</p> <p>In respect of AB2 surely there can be no further requirement for 'warehousing' - just look around the area.</p> <p>This would destroy access to the country side, significant wildlife areas and turn Stoke into warehouse central.</p> <p>Instead; wind turbines or solar fields would mean that the area could still be used but would benefit the national grid.</p>

<b>Comment ID</b>	NULLP405
<b>Order</b>	41
<b>Number</b>	7
<b>Title</b>	Housing
<b>Consultee Family Name</b>	Richards
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	I have concerns that only affordable housing is mentioned in this section of the local plan and that even 4 bedroom houses are included n the break down of intended housing . Social housing is not mentioned which is astounding as we as a borough council hold the housing waiting list so I find it very concerning that we are not including any proposed social housing.

<b>Comment ID</b>	NULLP722
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation.</p> <p>Richborough is an experienced land promoter that brings forward a range of deliverable developments sites in sustainable locations across the country, including in Newcastle-under-Lyme Borough for housing, employment and mixed use schemes in order to meet development needs.</p> <p>Richborough welcomes the opportunity to comment on the DLP and supports the Council's endeavours to prepare a new Local Plan for the Borough to guide development over the next 20 years. It is considered that the adoption of a new Local Plan is of the upmost importance for the Borough given that NULBC's extant Local Plan ("LP") was adopted in 2003 and is 20 years old. New housing allocations are very much needed in order to deliver a planned supply of open market and affordable housing in both the urban and rural areas the coming years.</p> <p>Adopting a local plan that reflects up to date housing and economic development needs and allocates a sufficient amount of sites to meet those needs in the Newcastle-under-Lyme Borough is essential. The adoption of a robust Local Plan that allocates a sufficient amount of development land gives the Council a choice about where to meet its housing and economic development needs, creates certainty, and ensures that future needs can be achieved in a sustainable way and delivers the associated physical and social infrastructure that is required to support such development.</p> <p>Richborough therefore supports the preparation of a new Local Plan and provides a number of comments in relation to the proposed draft policies, in addition to providing support for draft allocation reference SP23 which our client has a legal interest in / control over. SP23 forms a part of the Council's Local Plan strategy to deliver sustainable growth around Keele University and Richborough wholeheartedly support this part of the Council's growth strategy.</p> <p>Whilst it is the case that the Government has recently consulted upon a revised NPPF, it is the Government's position that local authorities should continue to progress with the delivery of up-to-date local plans. Richborough therefore welcomes this consultation and supports the Council in its efforts in bringing forward a new Local Plan.</p> <p>Further to the above, Richborough are mindful of the transitional arrangements proposed in the draft revised NPPF for the purposes of plan-making.</p> <p>Annex 1 to the draft NPPF contains implementation provisions as follows:</p> <p>"For the purposes of plan-making</p> <p>226. The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plans from [publication date + one month] unless one or more of the following apply:</p> <p>a. the emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure;</p> <p>b. the local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework;</p> <p>c. the local plan is or has been submitted for examination under Regulation 22 on or before [publication date + one month].</p> <p>Where a, b or c applies, the plan will be examined under the relevant previous version of the Framework.</p> <p>227. Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.</p> <p>228. After applying the policies of this version of the Framework, local plans that have reached Regulation 19 (pre-submission stage) on or before [publication date + one month] with an emerging annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure should proceed to examination within a maximum of 18 months from [publication date].</p> <p>229. For Spatial Development Strategies, this Framework applies to strategies that reach consultation under section 335(2) of the Greater London Authority Act 1999 on or after [publication date + one month]. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework."</p> <p>Accompanying this submission is a Counsel opinion from David Manley KC (Appendix 1). This sets out that the draft Regulation 19 Local Plan for Newcastle-under-Lyme would fall squarely within exception 226(a) (as the annual housing requirement proposed in the Regulation 19 Plan is less than 200 dwellings</p>

	<p>than the Local Housing Need figure) and that the plan as currently proposed should proceed to examination. Further to this, Government Guidance on the issue of transitional arrangements provided with the consultation document: "Proposed reforms to the National Planning Policy Framework and other changes to the planning system" (updated 2nd August 2024) states, inter alia:</p> <p>"Transitional arrangements for emerging plans in preparation</p> <p>4. We propose transitional arrangements to maintain the progress of plans at more advanced states of preparation, while maximising proactive planning for the homes our communities need. These will apply differently depending on what stage of preparation the plan has reached and the extent to which it is meeting the Government's housing growth aspirations. These transitional arrangements are set out in Annex 1 of the NPPF and outlined below</p> <p>6. To help local planning authorities with advanced plans to proceed to examination at pace and support the Government's ambition to build more homes, those plans that have reached Regulation 19 publication stage but not yet been submitted for examination one month after the revised framework is published, with a gap of no more than 200 dwellings per annum between the local planning authority's revised LHN figure and its proposed housing requirement (as set out in the Publication version of the plan), should also progress to examination under the version of the NPPF it has used when preparing the plan thus far."</p> <p>The whole purpose of the transitional provisions as drafted is to strike a pragmatic balance between the need to increase housing provision on the one hand and the need to achieve Local Plan coverage and avoid wasted time and expense on the other.</p> <p>The advice from Counsel goes on to state that if the NPPF is issued in its draft form then it is an important material consideration and unless local circumstances clearly indicated a need to depart from NPPF advice it is the Government's (and PINS') expectation that it will be applied. It is therefore our position that the Newcastle-under-Lyme Regulation 19 Plan can be submitted for examination.</p> <p>Knights, on behalf of Richborough, would like to participate in the examination hearings in response to the various policies and allocations for which representations are made in this submission.</p> <p>The Council's overall development strategy seeks to deliver a minimum of 8,000 dwellings over the plan period at 400 dwellings per annum. At Regulation 18 stage, the Council sought to deliver 7,160 dwellings over the plan period (358 dwellings per annum).</p> <p>At Regulation 18 stage, we argued on behalf of Richborough that the housing requirement should be higher on the basis that the affordable housing need identified at that time (278 affordable homes per annum) amounted to around 77% of the housing requirement.</p> <p>As such, the increase of the requirement to 400 dwellings per annum is welcome and is supported, however the annual affordable housing need still equates to around 69% of the annual housing requirement for Newcastle-under-Lyme.</p> <p>The expression of the housing requirement as a minimum starting point is welcome.</p> <p>Given the high level of affordable housing need and the Council's aspirations to deliver economic growth, it is considered that the increase in the annual housing requirement is justified by the evidence and is therefore sound.</p> <p>It is therefore suggested that as a minimum, all of the proposed allocations identified in the current DLP must be retained in order to ensure that the housing requirement can be delivered over the plan period.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a> <a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a>
<b>Comment ID</b>	NULLP726
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Policy PSD 5 proposes to alter Green Belt boundaries in order to allocate a number of development sites. It is considered that this policy is justified on the basis that there is limited urban capacity in Newcastle-under-Lyme, and there is a limited amount of previously developed land available to meet development needs. In particular, there is a high level of need for affordable housing and this cannot all be met within the urban boundary. Exceptional circumstances to justify the release of land from the Green Belt is set out further below.</p>



The policy concept of what constitutes exceptional circumstances for releasing land from the Green Belt through plan making has been considered in the High Court.

In *Compton Parish Council vs Guildford Borough Council* [2019] EWHC 3242 (Admin) ("The Guildford judgement") where the main general issue of the challenge was whether the Inspector, in recommending that the Local Plan be adopted, had erred in law in his approach to what constituted the "exceptional circumstances" required for the redrawing of Green Belt boundaries in a local plan review.

In the Guildford judgment, Sir Duncan Ousley, sitting as a High Court Judge confirmed that:

(a) There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.

(b) Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.

(c) A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.

(d) "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."

(e) The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.

(f) General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.

The above judgement confirms that there is a very broad exercise of planning judgment for the decision-maker which the courts will not readily disturb. This can include meeting the need for market housing.

The NPPF at paragraph 141 the NPPF provides more guidance on what will add up to exceptional circumstances:

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

In the case of Newcastle-under-Lyme, each of the above will be taken in turn.

Making as much use as possible of suitable brownfield sites and underutilised land

The council recently undertook a call for brownfield sites exercise and a Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (June 2023) forms part of the evidence base. This study considered a range of vacant and infill sites, and considered the scope for the conversion of upper storey floorspace of existing commercial buildings. This study was also informed by sites identified in the SHELAA.

Paragraph 8.11 of the Issues and Options consultation document previously consulted upon stated that evidence gathered as part of the now abandoned Joint Local Plan exercise with Stoke-on-Trent City Council suggested that approximately 2,500 dwellings could be found on land within existing development boundaries, which would be at least 4,660 dwellings short of the minimum housing requirement figure established using the nationally set starting requirement of 7,160 established using the Standard Method or 5,500 short of the Regulation 19 Local Plan requirement of 8,000 dwellings.

The latest SHELAA and Urban Capacity Study have not identified any significant amounts of further brownfield sites that were not considered previously. The latest SHELAA (dated 2024)

identifies a deliverable and developable supply of brownfield sites that amount to the delivery of 1938 homes. When other deliverable and developable greenfield site that are not located in the Green Belt are considered, there is a capacity to deliver a further 1012 dwellings. Mixed brownfield/greenfield sites can deliver a further 147 dwellings. This amounts to a total of 3097 dwellings that are deliverable/already have planning permission or developable. This amounts to a shortfall of at least 4,093 dwellings.

The above figures strongly suggest that land beyond existing settlement boundaries is required to deliver the Council's minimum housing requirement of 8,000 dwellings over the plan period.

Whilst national policy seeks to exhaust previously developed sites for housing delivery before releasing Green Belt sites, meeting housing needs also have to be balanced with meeting economic development needs, with many economic development needs (including, but not limited to, office, retail, leisure, manufacturing and distribution) also requiring the use of previously developed land or buildings. This is particularly true if they are located on existing employment parks or within town centres, or otherwise located where businesses require to be located based on their business needs and/or customer demands. In light of these conclusions, it is considered that the Council has made good progress in granting planning permission for residential development on sites within the development boundary, including on brownfield land, however it is very clear that minimum housing needs cannot be met on these types of sites alone. Optimising the Density of Development

With regard to optimising the density of development, if limited development sites are available within existing development boundaries, then opportunities for delivering higher density development will be limited. Whilst some higher density development has occurred within Newcastle-under-Lyme town centre, other opportunities are likely to be limited due to the following factors:

- (a) Conservation areas / special character area designations
- (b) Listed buildings and the need to appropriately take into account their settings
- (c) Prevailing densities/character of existing residential areas, particular those of sub-urban character where high density or high rise development is likely to be inappropriate in design and amenity terms
- (d) Other locational specific constraints.

6.16 Whilst there may be possibilities to increase the density of new development within existing urban areas or other non-Green Belt sites, it is unlikely that this could be done on a sufficient number of such sites to remove any need to release land from the Green Belt at all.

Meeting any Unmet Housing Needs in Neighbouring Authorities

At the time of preparing this Local Plan, a number of neighbouring authorities have recently adopted development plans. Staffordshire Moorlands adopted a local plan in 2020 and Cheshire East Council adopted its part 1 Local Plan Strategy in 2017. The Cheshire East Site Allocations and Policies DPD has also been recently adopted. Stafford Borough Council are currently reviewing their local plan, but have yet to reach examination stage. Stoke-on-Trent City Council are also in the early stages of preparing a new Local Plan.

In light of the above, the following authorities are unlikely to be in a position to accommodate any unmet needs in Newcastle-under-Lyme:

- (a) Cheshire East
- (b) Shropshire
- (c) Staffordshire Moorlands

With regard to Stafford Borough and Stoke-on-Trent, it is, at this stage, unclear what additional needs these authorities may be able to accommodate, however it should be noted that Stoke-on-Trent's minimum housing needs are currently subject to the 35% uplift for urban areas, so it is unclear if any further need from Newcastle-under-Lyme could be met within Stoke-on-Trent over the plan period. Furthermore, the Government's review of the Standard Method suggests that local housing need figures for all surrounding local authority areas could significantly increase over and above the existing Standard Method requirement if the new Standard Method is confirmed.

With regard to Stoke-on-Trent, when Newcastle-under-Lyme were pursuing a Joint Local Plan with Stoke-on-Trent City Council, Stoke-on-Trent indicated that they could accommodate around 800 dwellings of Newcastle-under-Lyme's unmet needs. This figure still remains substantially short of the housing need required in Newcastle-under-Lyme that cannot be accommodated within existing development boundaries. Stoke-on-Trent have yet to make significant progress on a new Local Plan since a consultation on Issues and Options took place between May and June 2021.

With regard to economic development needs, this will also be a material factor, particularly where economic growth factors are linked to existing employment sites that need to expand and are inextricably linked, such as Keele University and Science Park. Their expansion needs are unlikely to be able to be accommodated in other local authority areas and will need to be anchored to their existing site. As such, in addition to housing factors, there are economic development needs that won't be able to be accommodated in other local authority areas.

Other Considerations Amounting to Exceptional Circumstances to Justify the Release of Land from the Green Belt

As set out above, meeting housing needs can amount to exceptional circumstances to justify the release of land from the Green Belt. By extension, this is also considered to apply in terms of meeting economic development needs and facilitating sustainable patterns of development in the Borough.

Having a suitable range of employment sites in suitable locations to meet future economic development needs and providing more scope to adapt to future changes in the economy therefore justify the need to review Green Belt boundaries. For example, Newcastle-under-Lyme is well located in relation to the strategic road network, in particular the A500 and the M6. Large warehouses and distribution centres will require large sites with good access to the strategic road network, and such sites are best placed to be located outside of urban areas where access for large vehicles is likely to be more problematic. As such, it is considered that a review of the Green Belt in Newcastle-under-Lyme is necessary to meet both economic needs and housing needs.

Promoting sustainable patterns of development is also a relevant factor to consider, as set out at paragraph 142 of the Framework, which states:

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.

The above was a material factor explored at length during the examination of the Cheshire East Local Plan, with northern parts of the Borough heavily constrained by Green Belt designations.

Green Belt release around the northern towns in the Cheshire East Borough was justified as follows<sup>1</sup>:

Without alterations to the detailed Green Belt boundaries, the amount of new development that could be planned for in the north of the borough would be very low. It is considered that such a low level of development would have severe consequences including:

- Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to young people and key workers being unable to stay in the area.
- An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age.
- Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.
- Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area.
- A decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.

	<p>Some parallels can be drawn between Cheshire East and Newcastle-under-Lyme. For example, as Newcastle-under-Lyme town is currently ring-fenced by Green Belt, any substantial levels of development on non-Green Belt land outside of the development boundary would need to leapfrog the Green Belt towards the periphery of the Borough in locations such as Loggerheads, although it is acknowledged that the settlements of Baldwins Gate and Loggerheads, which are not heavily constrained by Green Belt, are considered to be sustainable locations.</p> <p>More broadly, the release of sites from the Green Belt on the periphery of the urban area in particular, sites around/adjacent to the Keele University Campus, for example, through the allocation of SP23, would deliver a sustainable pattern of development that is aligned to the Council's economic growth aspirations.</p> <p>In addition, there is a substantial need to deliver an uplift in affordable housing in Newcastle-under-Lyme in light of the high level of affordable housing need, with a need to deliver a net increase of at least 278 affordable homes per annum.</p> <p>The above considerations add further weight to the case that exceptional circumstances exist to justify Green Belt release in Newcastle-under-Lyme.</p> <p>In light of the above, it is considered that Policy PSD 5 is justified, as are the proposed allocations that follow from it. Richborough therefore support Policy PSD 5 and the release of SP23 for the delivery of 200 dwellings.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP730
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Richborough recognise the need to secure the funding of infrastructure that is directly related in scale and kind and which is necessary to make development acceptable in planning terms.</p> <p>However, it is noted that the local healthcare trusts often request contributions towards healthcare provision, however such contributions should be justified and transparent. On this point, the Council should take into account recent case law<sup>2</sup> in formulating a policy for the provision of healthcare contributions and what such contributions should contribute towards. For example, these cases found that it was acceptable for contributions to be made to the provision of physical infrastructure, such as a new or extended GP surgery in response to additional demand arising from new development, however it is not acceptable to seek contributions towards services where no funding gaps have been identified when annual funding has been negotiated to account for population growth.</p> <p>The statutory framework for funding NHS services is summarised succinctly in the recent Worcestershire case at paragraphs 55 to 57 of the judgement as follows:</p> <p>55. A CCG has a duty to arrange for the provision of a range of health services to such extent as it considers necessary to meet the reasonable requirements of "the persons for whom it has responsibility." Essentially those are persons registered with GPs or otherwise "usually residing in the area" of the CCG ([46]). NHS England is responsible for allotting funds each financial year to each CCG towards meeting the expenditure of that group "attributable to the performance by it of its functions in that year." A CCG must then ensure that its expenditure on the performance of its functions does not exceed the amount allotted to it, plus any other sums received by it in that year ([50]).</p> <p>56. An NHS Trust provides services for the purposes of the health service. The claimant is one of the providers from whom CCGs obtain services in order to discharge their functions ([52]). CCGs and NHS Trusts negotiate contracts for these purposes ([54] et seq). An NHS Trust is obliged to ensure that its revenue is not less than sufficient, taking one financial year with another, to meet its revenue outgoings ([53]).</p> <p>57. The detailed schemes dealing with different types of funding arrangements are, to say the least, convoluted and lacking in transparency (Leicester at [66] to [72]). Even with the assistance in that case of experienced specialist counsel it was impossible to pin down which part of these schemes applied to block contracts. However, Mr Cairnes accepted in Leicester that the funding rules do not preclude a</p>

	<p>CCG and NHS Trust from negotiating a block contract for the next financial year which takes into account population growth, or additional hospital activity resulting from first year occupancy of new development during that financial year ([73]). The Trust in the present case did not adopt any different position. Indeed, the Trust's representations to the defendants proceeded on that basis (see e.g. para.30 of the representations dated 14 January 2021).</p> <p>Richborough note the Interim Infrastructure Delivery Plan as part of the Local Plan evidence base which includes commentary on healthcare provision, however this will not be a policy document, and the Council's approach to securing healthcare contributions and what those contributions can be used for should be clearly set out in Local Plan policy so that it is clear and transparent to health care providers, developers, elected Members and residents as to what funding can be secured for healthcare provision and what it can be used for. It should also make clear in supporting text what evidence healthcare providers should submit to the council to justify their request for contributions.</p> <p>The above points were raised in our response at Regulation 18 stage and do not appear to have been taken into account as part of the Regulation 19 Local Plan. It is considered that further consideration be given to the above matter and that the policy is amended accordingly.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a> <a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a>
<b>Comment ID</b>	NULLP734
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Strategic Objectives
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail.</p> <p>The DLP includes a list of 12 strategic objectives. Strategic Objectives SO-III, SO-V, SO-V1 are relevant to the delivery of open market and affordable housing and seek to deliver a higher mix of residential uses into existing town centres, provide a mix of housing types across the Borough, and to support the vitality of rural villages by improving affordability and to provide choice in housing types for local people. Richborough generally supports the above objectives.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP738
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	Yes



<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail.</p> <p>Policy PSD 5 proposes to alter Green Belt boundaries in order to allocate a number of development sites. It is considered that this policy is justified on the basis that there is limited urban capacity in Newcastle-under-Lyme, and there is a limited amount of previously developed land available to meet development needs. In particular, there is a high level of need for affordable housing and this cannot all be met within the urban boundary.</p> <p>Exceptional circumstances to justify the release of land from the Green Belt is set out further below.</p> <p>The policy concept of what constitutes exceptional circumstances for releasing land from the Green Belt through plan making has been considered in the High Court.</p> <p>In <i>Compton Parish Council vs Guildford Borough Council</i> [2019] EWHC 3242 (Admin) ("The Guildford judgement") where the main general issue of the challenge was whether the Inspector, in recommending that the Local Plan be adopted, had erred in law in his approach to what constituted the "exceptional circumstances" required for the redrawing of Green Belt boundaries in a local plan review.</p> <p>In the Guildford judgment, Sir Duncan Ousley, sitting as a High Court Judge confirmed that:</p> <p>(a) There is no definition of the policy concept of "exceptional circumstances". This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case. It is deliberately broad, and not susceptible to dictionary definition.</p> <p>(b) Whether a particular factor was capable of being an "exceptional circumstance" in any particular case was a matter of law; but whether in any particular case it was treated as such, was a matter of planning judgment.</p> <p>(c) A judicial decision that a factor relied on by a planning decision-maker as an "exceptional circumstance" was not in law capable of being one is likely to require some caution and judicial restraint. All that is required is that the circumstances relied on, taken together, rationally fit within the scope of "exceptional circumstances" in this context. The breadth of the phrase and the array of circumstances which may come within it place the judicial emphasis very much more on the rationality of the judgment than on providing a definition or criteria or characteristics for that which the policy-maker has left in deliberately broad terms.</p> <p>(d) "Exceptional circumstances" is a less demanding test than the development control test for permitting inappropriate development in the Green Belt, which requires "very special circumstances."</p> <p>(e) The phrase does not require at least more than one individual "exceptional circumstance". The "exceptional circumstances" can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary.</p> <p>(f) General planning needs, such as ordinary housing, are not precluded from its scope; indeed, meeting such needs is often part of the judgment that "exceptional circumstances" exist; the phrase is not limited to some unusual form of housing, nor to a particular intensity of need.</p> <p>The above judgement confirms that there is a very broad exercise of planning judgment for the decision-maker which the courts will not readily disturb. This can include meeting the need for market housing.</p> <p>The NPPF at paragraph 141 the NPPF provides more guidance on what will add up to exceptional circumstances:</p> <p>Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:</p> <p>a) makes as much use as possible of suitable brownfield sites and underutilised land;</p> <p>b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and</p> <p>c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.</p> <p>In the case of Newcastle-under-Lyme, each of the above will be taken in turn.</p> <p>Making as much use as possible of suitable brownfield sites and underutilised land</p> <p>The council recently undertook a call for brownfield sites exercise and a Newcastle-under-Lyme and Kidsgrove Urban Capacity and Town Centre Regeneration Study (June 2023) forms part of the evidence base. This study considered a range of vacant and infill sites, and considered the scope for the conversion of upper storey floorspace of existing commercial buildings. This study was also informed by sites identified in the SHELAA.</p> <p>Paragraph 8.11 of the Issues and Options consultation document previously consulted upon stated that evidence gathered as part of the now abandoned Joint Local Plan exercise with Stoke-on-Trent City Council suggested that approximately 2,500 dwellings could be found on land within existing development boundaries, which would be at least 4,660 dwellings short of the minimum housing requirement figure established using the nationally set starting requirement of 7,160 established using the Standard Method or 5,500 short of the Regulation 19 Local Plan requirement of 8,000 dwellings.</p> <p>The latest SHELAA and Urban Capacity Study have not identified any significant amounts of further brownfield sites that were not considered previously. The latest SHELAA (dated 2024) identifies a deliverable and developable supply of brownfield sites that amount to the delivery of 1938 homes. When other deliverable and developable greenfield site that are not located in the Green Belt are considered, there is a capacity to deliver a further 1012 dwellings. Mixed brownfield/greenfield sites can deliver a further 147 dwellings. This amounts to a total of 3097 dwellings that are deliverable/already have planning permission or developable. This amounts to a shortfall of at least 4,093 dwellings.</p>

The above figures strongly suggest that land beyond existing settlement boundaries is required to deliver the Council's minimum housing requirement of 8,000 dwellings over the plan period.

Whilst national policy seeks to exhaust previously developed sites for housing delivery before releasing Green Belt sites, meeting housing needs also have to be balanced with meeting economic development needs, with many economic development needs (including, but not limited to, office, retail, leisure, manufacturing and distribution) also requiring the use of previously developed land or buildings. This is particularly true if they are located on existing employment parks or within town centres, or otherwise located where businesses require to be located based on their business needs and/or customer demands. In light of these conclusions, it is considered that the Council has made good progress in granting planning permission for residential development on sites within the development boundary, including on brownfield land, however it is very clear that minimum housing needs cannot be met on these types of sites alone.

#### Optimising the Density of Development

With regard to optimising the density of development, if limited development sites are available within existing development boundaries, then opportunities for delivering higher density development will be limited. Whilst some higher density development has occurred within Newcastle-under-Lyme town centre, other opportunities are likely to be limited due to the following factors:

- (a) Conservation areas / special character area designations
- (b) Listed buildings and the need to appropriately take into account their settings
- (c) Prevailing densities/character of existing residential areas, particular those of sub-urban character where high density or high rise development is likely to be inappropriate in design and amenity terms
- (d) Other locational specific constraints.

Whilst there may be possibilities to increase the density of new development within existing urban areas or other non-Green Belt sites, it is unlikely that this could be done on a sufficient number of such sites to remove any need to release land from the Green Belt at all.

#### Meeting any Unmet Housing Needs in Neighbouring Authorities

At the time of preparing this Local Plan, a number of neighbouring authorities have recently adopted development plans. Staffordshire Moorlands adopted a local plan in 2020 and Cheshire East Council adopted its part 1 Local Plan Strategy in 2017. The Cheshire East Site Allocations and Policies DPD has also been recently adopted. Stafford Borough Council are currently reviewing their local plan, but have yet to reach examination stage. Stoke-on-Trent City Council are also in the early stages of preparing a new Local Plan.

In light of the above, the following authorities are unlikely to be in a position to accommodate any unmet needs in Newcastle-under-Lyme:

- (a) Cheshire East
- (b) Shropshire
- (c) Staffordshire Moorlands

With regard to Stafford Borough and Stoke-on-Trent, it is, at this stage, unclear what additional needs these authorities may be able to accommodate, however it should be noted that Stoke-on-Trent's minimum housing needs are currently subject to the 35% uplift for urban areas, so it is unclear if any further need from Newcastle-under-Lyme could be met within Stoke-on-Trent over the plan period. Furthermore, the Government's review of the Standard Method suggests that local housing need figures for all surrounding local authority areas could significantly increase over and above the existing Standard Method requirement if the new Standard Method is confirmed.

With regard to Stoke-on-Trent, when Newcastle-under-Lyme were pursuing a Joint Local Plan with Stoke-on-Trent City Council, Stoke-on-Trent indicated that they could accommodate around 800 dwellings of Newcastle-under-Lyme's unmet needs. This figure still remains substantially short of the housing need required in Newcastle-under-Lyme that cannot be accommodated within existing development boundaries. Stoke-on-Trent have yet to make significant progress on a new Local Plan since a consultation on Issues and Options took place between May and June 2021.

With regard to economic development needs, this will also be a material factor, particularly where economic growth factors are linked to existing employment sites that need to expand and are inextricably linked, such as Keele University and Science Park. Their expansion needs are unlikely to be able to be accommodated in other local authority areas and will need to be anchored to their existing site. As such, in addition to housing factors, there are economic development needs that won't be able to be accommodated in other local authority areas.

#### Other Considerations Amounting to Exceptional Circumstances to Justify the Release of Land from the Green Belt

As set out above, meeting housing needs can amount to exceptional circumstances to justify the release of land from the Green Belt. By extension, this is also considered to apply in terms of meeting economic development needs and facilitating sustainable patterns of development in the Borough.

Having a suitable range of employment sites in suitable locations to meet future economic development needs and providing more scope to adapt to future changes in the economy therefore justify the need to review Green Belt boundaries. For example, Newcastle-under-Lyme is well located in relation to the strategic road network, in particular the A500 and the M6. Large warehouses and distribution centres will require large sites with good access to the strategic road network, and such sites are best placed to be located outside of urban areas where access for large vehicles is likely to be more problematic. As such, it is considered that a review of the Green Belt in Newcastle-under-Lyme is necessary to meet both economic needs and housing needs.

Promoting sustainable patterns of development is also a relevant factor to consider, as set out at paragraph 142 of the Framework, which states:

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.

The above was a material factor explored at length during the examination of the Cheshire East Local Plan, with northern parts of the Borough heavily constrained by Green Belt designations.

Green Belt release around the northern towns in the Cheshire East Borough was justified as follows<sup>1</sup>: Without alterations to the detailed Green Belt boundaries, the amount of new development that could be planned for in the north of the borough would be very low. It is considered that such a low level of development would have severe consequences including:



	<ul style="list-style-type: none"> <li>• Demand for new housing outstripping supply, further increasing house prices and a lack of new affordable housing provision leading to young people and key workers being unable to stay in the area.</li> <li>• An increasingly ageing population as young people leave and an absolute reduction in the number of people of working age.</li> <li>• Difficulty in attracting inward investment and economic growth. In areas of relatively unaffordable housing, employers have difficulty in recruiting to lower paid positions.</li> <li>• Increases in traffic and congestion as people unable to live close to their place of work are forced to travel longer distances for employment and the smaller working-age population living locally would also mean more people commuting in to the area.</li> <li>• A decline in the vibrancy and vitality of town centres and some local services and facilities becoming unviable.</li> </ul> <p>Some parallels can be drawn between Cheshire East and Newcastle-under-Lyme. For example, as Newcastle-under-Lyme town is currently ring-fenced by Green Belt, any substantial levels of development on non-Green Belt land outside of the development boundary would need to leapfrog the Green Belt towards the periphery of the Borough in locations such as Loggerheads, although it is acknowledged that the settlements of Baldwins Gate and Loggerheads, which are not heavily constrained by Green Belt, are considered to be sustainable locations.</p> <p>More broadly, the release of sites from the Green Belt on the periphery of the urban area in particular, sites around/adjacent to the Keele University Campus, for example, through the allocation of TB19, would deliver a sustainable pattern of development that is aligned to the Council's economic growth aspirations.</p> <p>In addition, there is a substantial need to deliver an uplift in affordable housing in Newcastle-under-Lyme in light of the high level of affordable housing need, with a need to deliver a net increase of at least 278 affordable homes per annum.</p> <p>The above considerations add further weight to the case that exceptional circumstances exist to justify Green Belt release in Newcastle-under-Lyme.</p> <p>In light of the above, it is considered that Policy PSD 5 is justified, as are the proposed allocations that follow from it. Richborough therefore support Policy PSD 5 and the release of TB19 for the delivery of 550 dwellings.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a>
<b>Comment ID</b>	NULLP742
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. Richborough recognise the need to secure the funding of infrastructure that is directly related in scale and kind and which is necessary to make development acceptable in planning terms.</p> <p>However, it is noted that the local healthcare trusts often request contributions towards healthcare provision, however such contributions should be justified and transparent. On this point, the Council should take into account recent case law<sup>2</sup> in formulating a policy for the provision of healthcare contributions and what such contributions should contribute towards. For example, these cases found that it was acceptable for contributions to be made to the provision of physical infrastructure, such as a new or extended GP surgery in response to additional demand arising from new development, however it is not acceptable to seek contributions towards services where no funding gaps have been identified when annual funding has been negotiated to account for population growth.</p> <p>The statutory framework for funding NHS services is summarised succinctly in the recent Worcestershire case at paragraphs 55 to 57 of the judgement as follows:</p> <p>55. A CCG has a duty to arrange for the provision of a range of health services to such extent as it considers necessary to meet the reasonable requirements of "the persons for whom it has responsibility." Essentially those are persons registered with GPs or otherwise "usually residing in the area" of the CCG ([46]). NHS England is responsible for allotting funds each financial year to each CCG towards meeting the expenditure of that group "attributable to the performance by it of its functions in that year." A CCG</p>

	<p>must then ensure that its expenditure on the performance of its functions does not exceed the amount allotted to it, plus any other sums received by it in that year ([50]).</p> <p>56. An NHS Trust provides services for the purposes of the health service. The claimant is one of the providers from whom CCGs obtain services in order to discharge their functions ([52]). CCGs and NHS Trusts negotiate contracts for these purposes ([54] et seq). An NHS Trust is obliged to ensure that its revenue is not less than sufficient, taking one financial year with another, to meet its revenue outgoings ([53]).</p> <p>57. The detailed schemes dealing with different types of funding arrangements are, to say the least, convoluted and lacking in transparency (Leicester at [66] to [72]). Even with the assistance in that case of experienced specialist counsel it was impossible to pin down which part of these schemes applied to block contracts. However, Mr Cairnes accepted in Leicester that the funding rules do not preclude a CCG and NHS Trust from negotiating a block contract for the next financial year which takes into account population growth, or additional hospital activity resulting from first year occupancy of new development during that financial year ([73]). The Trust in the present case did not adopt any different position. Indeed, the Trust's representations to the defendants proceeded on that basis (see e.g. para.30 of the representations dated 14 January 2021).</p> <p>Richborough note the Interim Infrastructure Delivery Plan as part of the Local Plan evidence base which includes commentary on healthcare provision, however this will not be a policy document, and the Council's approach to securing healthcare contributions and what those contributions can be used for should be clearly set out in Local Plan policy so that it is clear and transparent to health care providers, developers, elected Members and residents as to what funding can be secured for healthcare provision and what it can be used for. It should also make clear in supporting text what evidence healthcare providers should submit to the council to justify their request for contributions.</p> <p>The above points were raised in our response at Regulation 18 stage and do not appear to have been taken into account as part of the Regulation 19 Local Plan. It is considered that further consideration be given to the above matter and that the policy is amended accordingly.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP724
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations.</p> <p>This policy seeks to direct most development towards the urban areas of Newcastle-under-Lyme and Kidsgrove with some more limited development to the rural centres.</p> <p>In general terms, there is no objection to the policy presumption to directing the most development towards the larger urban centres, Keele University and the larger Rural Centres, including Baldwins Gate. This chapter will give further consideration to the proposed growth around Newcastle-under-Lyme, Keele University and Baldwins Gate below.</p> <p>Newcastle-under-Lyme and Keele University</p> <p>Keele University and Science Park has been a key part of the Council's growth strategy identified in previous drafts of the Local Plan, and previous consultations on the draft Joint Local Plan with Stoke-on-Trent. It is well placed to deliver quality well paid employment and is also well related to the Newcastle-under-Lyme urban area with both locations providing mutual benefits and synergies with each other.</p> <p>Richborough supports the retained focus on Keele University as an area of growth in the current version of the DLP and the sustainable expansion of Newcastle-under-Lyme.</p> <p>The allocation of SP23 is well placed to deliver mutual benefits of growth to both Keele University and Newcastle-under-Lyme. The site is located towards the edge of the Newcastle-under-Lyme urban area and provides a strategic link between the urban area and the University and Science Park.</p> <p>Richborough has been engaging and working collaboratively with Keele University to facilitate a joined up approach to the growth of Newcastle-under-Lyme and Keele and this site forms part of wider discussions held to date.</p>

	<p>It site can also deliver high quality housing to support the employment growth at the University and Science Park by providing homes in close proximity to employment as well as providing housing in close proximity to other services and facilities within the urban area.</p> <p>Therefore, the growth of Newcastle-under-Lyme and Keele are complimentary to each other and this growth is supported as part of the overall distribution of development. SP23 forms an important component of this distribution of development and the allocation of this site is considered to be sound. Further commentary regarding site specific policies for these two draft allocations will be provided later in this submission.</p> <p>In summary, it is the position of Richborough that the proposed settlement hierarchy is justified.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a> <a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP728
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Policy HOU 1 seeks to provide a series of thresholds for affordable housing provision, with differing thresholds between greenfield and brownfield sites.</p> <p>The current policy is to seek 25% affordable housing from major residential sites, and it is proposed to increase this requirement to 30% for greenfield sites.</p> <p>As a general point, Richborough recognise that affordable housing was a key issue at the recent Baldwins Gate Appeal and that there is a high level of need across the Borough at 278 dwellings per annum. Richborough therefore do not object to the proposal to increase the affordable housing requirement to 30% on greenfield sites.</p> <p>Richborough are committed to delivering a broad mix of homes as part of their development sites to meet identified needs across the Borough and are keen to assist the Council in delivering its housing objectives, including through allocating large housing sites, such as SP23. Richborough therefore do not object to the affordable housing thresholds set out at Policy HOU1 and support the proposal to seek 30% affordable housing contributions on greenfield sites.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP725
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4

<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. As is acknowledged elsewhere in this submission, there is a substantial need for a step-change in open market and affordable housing delivery across the Borough, including in the rural areas. It should be ensured that the settlement boundaries are redrawn on the new policies maps that encompass existing development sites that have come forward on countryside sites in recent years, as well as encompassing proposed allocations. In the case of Newcastle-under-Lyme, the settlement boundary should be re-drawn around site allocation reference SP23 as well as the other allocations proposed around Keele University.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP729
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Since the Regulation 18 consultation, the policy wording has been amended such that a fixed housing mix is not referred to in the policy, but rather reference is made to a range of sources which can be used to inform the overall housing mix.</p> <p>The above policy change with the current mix identified in the Housing Needs Assessment provided in the supporting text is welcome. The addition to the supporting text that the housing mix will also depend on location and site context / characteristics is also welcome.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP733
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q5 Legally compliant</b>	Yes

<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Richborough have recently secured outline planning permission on appeal for 200 dwellings at Baldwins Gate Farm (LW74, identified in the plan as a commitment) , and are also promoting draft site allocation reference SP23 for development in the order of 200 dwellings. The inclusion of both of this site as an allocation is supported. This allocation that Richborough are promoting will be considered in further detail below against the relevant criteria of the SP23 site allocation policy.</p> <p>The site forms an important component of the council's overall development strategy, and is readily linked to the growth of the urban area and the growth of Keele University and Science Park.</p> <p>Policy SP23: Land at Cemetery Road</p> <p>As set out elsewhere in this representation, the client supports the inclusion of allocation reference SP23 (land off Cemetery Road / Park Lane) for 200 dwellings.</p> <p>The site forms an important component of the council's overall development strategy, and provides a strategic link between the growth of the urban area and the growth of Keele University and Science Park. The allocation of SP23 could provide new housing opportunities for those with links to the University such as graduates, research students and university professionals, in addition to a traditional family housing or "starter home" type of offer. The provision of some higher quality / aspirational homes in particular would align well with the Science and Innovation Park. With businesses increasingly required, as part of their corporate social responsibility objectives, to limit or reduce distances travelled to work, there are strong grounds to provide a range of higher quality housing options for business owners and their employees in close proximity to where they work. The allocation would also be able to deliver the 30% affordable housing requirement set out at Policy HOU 1, facilitating the delivery of around 60 affordable housing units in a highly sustainable location.</p> <p>In respect of the Green Belt itself, the allocation of the site would not unacceptably harm the five purposes of the Green Belt as identified in the Framework. Existing physical elements such as the wide and well established mature woodland boundary to the west, Keele University to the south and Silverdale to the north provide a strong and defensible Green Belt boundary which, together would physically and visually contain the proposed development. There would not be unrestricted urban sprawl into the surrounding open countryside; there would not be coalescence with other settlements and a precedent would not be set for further development to the west of the University campus. Further to this, the land to the west of the site (Keele Golf Course), is also proposed for allocation, and should the allocation of that site be confirmed, then SP23 would comprise a logical infill allocation. Otherwise, the site is visually self-contained due to the local topography and does not read as being part of an expansive tract of open countryside and there are no long distance views into and out of the site</p> <p>The consultation document suggests that SP23 should provide for defensible boundaries to the Green Belt, which should be achievable Given the surrounding context of the site.</p> <p>In light of the above considerations, Richborough supports the allocation of SP23, and are willing to work positively with the Council to deliver the masterplan-led approach to development in order to deliver a high quality, sustainable development to assist the Council in delivering its strategic objectives set out in the emerging Local Plan.</p> <p>The client intends to engage with developers in due course following the close of this consultation in order to bring forward a development partner for the site to ensure that the site would be deliverable within the proposed plan period.</p> <p><b>DELIVERABILITY</b></p> <p>Allocation reference SP23 is being promoted by Richborough who are national land promoters with a strong track record of bringing deliverable sites forward for development. In recent years, Richborough has brought forward two sites in the Borough on the edge of the settlement of Baldwins Gate. The most recent approval of planning permission for 200 dwellings was granted in the summer of 2023. Bellway are the development partner for that site and are due to commence the development of the site later this year.</p> <p>In terms of the delivery of this site, it is anticipated that following approval of an outline planning application, a reserved matters application to follow within three months of obtaining outline planning permission, with development to commence within 12 months of a grant of outline planning permission.</p> <p>It is anticipated that this site would deliver in the region of around 30-50 dwellings per annum with development to commence within 12 months of obtaining reserved matters planning permission.</p> <p>The site would therefore be deliverable within the plan period and would start delivering homes within the first 5 years of adoption.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP737
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights

<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. As is acknowledged elsewhere in this submission, there is a substantial need for a step-change in open market and affordable housing delivery across the Borough, including in the rural areas. It should be ensured that the settlement boundaries are redrawn on the new policies maps that encompass existing development sites that have come forward on countryside sites in recent years, as well as encompassing proposed allocations.</p> <p>In the case of Newcastle-under-Lyme, the settlement boundary should be re-drawn around site allocation reference TB19 as well as the other allocations proposed around Keele University.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP741
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. Since the Regulation 18 consultation, the policy wording has been amended such that a fixed housing mix is not referred to in the policy, but rather reference is made to a range of sources which can be used to inform the overall housing mix.</p> <p>The above policy change with the current mix identified in the Housing Needs Assessment provided in the supporting text is welcome. The addition to the supporting text that the housing mix will also depend on location and site context / characteristics is also welcome.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP745
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott



<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail.</p> <p>Richborough have recently secured outline planning permission on appeal for 200 dwellings at Baldwins Gate Farm (LW74, identified in the plan as a commitment) , and are also promoting draft site allocation reference TB19 for development in the order of 550 dwellings. The inclusion of this site as an allocation is supported.</p> <p>This allocation that Richborough are promoting will be considered in further detail below against the relevant criteria of the TB19 site allocation policy.</p> <p>The site forms an important component of the council's overall development strategy, and provide a strategic link between the growth of the urban area and the growth of Keele University and Science Park. TB19 in particular provides an important component of the growth around Keele University as it can facilitate the provision of a link from the A53 to Keele University.</p> <p>Policy TB19: Land at Whitmore Road</p> <p>The allocation of TB19 would provide new housing opportunities for those with links to the University such as graduates, research students and university professionals. The provision of higher quality / aspirational homes in particular would align well with the Science and Innovation Park. With businesses increasingly required, as part of their corporate social responsibility objectives, to limit or reduce distances travelled to work, there are strong grounds to provide a range of higher quality housing options for business owners and their employees in close proximity to where they work. The allocation would also be able to deliver the 30% affordable housing requirement set out at Policy HOU 1, facilitating the delivery of around 165 affordable housing units in a highly sustainable location.</p> <p>With regard to the first sentence of the policy, it states that the site "is allocated for residential development for 550 dwellings". In order to allow a degree of flexibility, it is suggested that the wording is amended slightly to read as follows: "is allocated for residential development for in the region of 550 dwellings".</p> <p>With regard to the allocation criteria of Policy TB19, each of the relevant criteria will be considered below in turn.</p> <p>Criteria 1 states that the requirements of Policy SA1 should be satisfactorily addressed. Policy SA1 sets out a number of requirements for the proposed site allocations that need to be addressed, including the following:</p> <ul style="list-style-type: none"> <li>(a) Masterplans</li> <li>(b) Affordable housing</li> <li>(c) Housing mix and density</li> <li>(d) Design</li> <li>(e) Historic environment</li> <li>(f) Social and community facilities</li> <li>(g) Landscape and green infrastructure</li> <li>(h) Biodiversity and Geodiversity</li> <li>(i) Highways</li> <li>(j) Environmental Health</li> <li>(k) Flood Risk</li> <li>(l) Utilities</li> <li>(m) Infrastructure</li> <li>(n) Minerals</li> </ul> <p>All of the above matters are addressed in more detail in the attached promotion document (Appendix 2) for the site by Richborough and demonstrate that the Policy SA1 requirements can be satisfactorily addressed.</p> <p>Criteria 2 of the policy requires access to be taken from the A53 (Whitmore Road). As set out in the promotion document, vehicular access to the site is proposed via two ghost island priority junctions from Whitmore Road. The two access points will be located at suitable offsets (in excess of 100m) from the Seabridge Lane junction. Based on surveyed 85th percentile speeds, visibility splays of 92m are achievable in both locations. Traffic would be likely to be split evenly between the two access junctions and no capacity issues are envisaged.</p> <p>Criteria 3 – 10 of the policy are addressed within the supporting promotion document as referenced above.</p> <p>With regard to criteria 11 and the provision of a link road to facilitate a connection to the A525, Richborough had already committed to providing bus, cycle and pedestrian link to the university. Discussions relating to this are ongoing between Richborough, the Highway Authority and the University in terms of facilitating such a link.</p> <p>With regard to financial contributions, it is anticipated that the development would be able to provide contributions towards local schools and health facilities subject to such requests being CIL compliant.</p> <p>With regard to the provision of the country park on the site, Criteria 6 of Policy PSD5 requires compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of the removal of land from the Green Belt.</p> <p>In this case, Richborough propose to provide a Country Park to the west of the site, which would provide landscaping, biodiversity improvements and recreational opportunities. The proposed allocation of TB19 would therefore be able to deliver compensatory improvements to the environmental quality and accessibility of remaining Green Belt in accordance with national policy and Policy PSD5 of the Regulation 19 Local Plan.</p>

	<p>In light of the above considerations, Richborough supports the allocation of TB19, and are willing to work positively with the Council to deliver the masterplan-led approach to development outlined in the attached promotion document in order to deliver a high quality, sustainable development to assist the Council in delivering its strategic objectives set out in the emerging Local Plan. Richborough intends to engage with developers in due course following the close of this consultation in order to bring forward a development partner for the site to ensure that the site would be deliverable within the proposed plan period.</p> <p><b>DELIVERABILITY</b></p> <p>Allocation reference TB19 is being promoted by Richborough who are national land promoters with a strong track record of bringing deliverable sites forward for development. In recent years, Richborough has brought forward two sites in the Borough on the edge of the settlement of Baldwins Gate. The most recent approval of planning permission for 200 dwellings was granted in the summer of 2023. Bellway are their development partner for that site and are due to commence the development later this year. In terms of delivery, it is anticipated that the development of the TB19 site would be brought forward involving two developers, and it is anticipated that housing would be delivered at a rate of around 30-50 homes per annum per developer.</p> <p>It is anticipated that upon the approval of an outline planning application, a reserved matters application would follow within three months of obtaining outline planning permission.</p> <p>It is estimated that the first site works would take place on the site within a year of obtaining outline planning permission.</p> <p>The site would therefore be deliverable within the plan period and would start delivering homes within the first 5 years of adoption.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP732
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Richborough has recently obtained planning permission for 200 dwellings on land at Baldwins Gate Farm and recognise the role that good design and the provision of green infrastructure plays in delivering a high quality development and environment that will benefit residents. Richborough designs in significant elements of green infrastructure into their schemes, and as was the case for the Baldwins Gate Farm scheme, open space and green infrastructure can be delivered as part of the proposed allocation at SP23. Richborough support the proposed space standards set out under Policy SE 6, and note that the policy has been amended since Regulation 18 stage to provide clarity (through criteria 2 of the policy) as to the basis of how such contributions would be calculated.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP736
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Richborough Estates

<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. This policy seeks to direct most development towards the urban areas of Newcastle-under-Lyme and Kidsgrove with some more limited development to the rural centres.</p> <p>In general terms, there is no objection to the policy presumption to directing the most development towards the larger urban centres, Keele University and the larger Rural Centres, including Baldwins Gate. This chapter will give further consideration to the proposed growth around Newcastle-under-Lyme, Keele University and Baldwins Gate below.</p> <p>Newcastle-under-Lyme and Keele University</p> <p>Keele University and Science Park has been a key part of the Council's growth strategy identified in previous drafts of the Local Plan, and previous consultations on the draft Joint Local Plan with Stoke-on-Trent. It is well placed to deliver quality well paid employment and is also well related to the Newcastle-under-Lyme urban area with both locations providing mutual benefits and synergies with each other.</p> <p>Richborough supports the retained focus on Keele University as an area of growth in the current version of the DLP and the sustainable expansion of Newcastle-under-Lyme.</p> <p>The allocation of TB19 is well placed to deliver mutual benefits of growth to both Keele University and Newcastle-under-Lyme. The site is located towards the edge of the Newcastle-under-Lyme urban area and provides a strategic link between the urban area and the University and Science Park. TB19 in particular can facilitate improved links between the urban area and the University and Science Park and therefore forms an important component of the councils distribution of development.</p> <p>Richborough has been engaging and working collaboratively with Keele University to facilitate a joined up approach to the growth of Newcastle-under-Lyme and Keele to ensure that both compliment each other.</p> <p>TB19 can facilitate a bus, pedestrian and cycle link between the south of Newcastle-under-Lyme and the University as well as potentially taking advantage of renewable energy generation (something currently being explored further), thereby facilitating a sustainable extension to the urban area. It can also deliver high quality housing to support the employment growth at the University and Science Park providing homes in close proximity to employment as well as providing housing in close proximity to other services and facilities within the urban area.</p> <p>Therefore, the growth of Newcastle-under-Lyme and Keele are complimentary to each other and this growth is supported as part of the overall distribution of development. TB19 forms an important component of this distribution of development and the allocation of this site is considered to be sound. Further commentary regarding site specific policies for these two draft allocations will be provided later in this submission.</p> <p>In summary, it is the position of Richborough that the proposed settlement hierarchy is justified.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP740
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes

<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. Policy HOU 1 seeks to provide a series of thresholds for affordable housing provision, with differing thresholds between greenfield and brownfield sites.</p> <p>The current policy is to seek 25% affordable housing from major residential sites, and it is proposed to increase this requirement to 30% for greenfield sites.</p> <p>As a general point, Richborough recognise that affordable housing was a key issue at the recent Baldwins Gate Appeal and that there is a high level of need across the Borough at 278 dwellings per annum. Richborough therefore do not object to the proposal to increase the affordable housing requirement to 30% on greenfield sites.</p> <p>Richborough are committed to delivering a broad mix of homes as part of their development sites to meet identified needs across the Borough and are keen to assist the Council in delivering its housing objectives, including through allocating large housing sites, such as TB19. Richborough therefore do not object to the affordable housing thresholds set out at Policy HOU1 and support the proposal to seek 30% affordable housing contributions on greenfield sites.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP744
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. Richborough has recently obtained planning permission for 200 dwellings on land at Baldwins Gate Farm and recognise the role that good design and the provision of green infrastructure plays in delivering a high quality development and environment that will benefit residents. Richborough designs in significant elements of green infrastructure into their schemes, and as was the case for the Baldwins Gate Farm scheme, significant areas of open space and green infrastructure can be delivered as part of the proposed allocation at TB19. Richborough support the proposed space standards set out under Policy SE 6, and note that the policy has been amended since Regulation 18 stage to provide clarity (through criteria 2 of the policy) as to the basis of how such contributions would be calculated</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a>
<b>Comment ID</b>	NULLP723
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Strategic Objectives
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation.</p> <p>Richborough is an experienced land promoter that brings forward a range of deliverable developments sites in sustainable locations across the country, including in Newcastle-under-Lyme Borough for housing, employment and mixed use schemes in order to meet development needs.</p> <p>Richborough welcomes the opportunity to comment on the DLP and supports the Council's endeavours to prepare a new Local Plan for the Borough to guide development over the next 20 years. It is considered that the adoption of a new Local Plan is of the utmost importance for the Borough given that NULBC's extant Local Plan ("LP") was adopted in 2003 and is 20 years old. New housing allocations are very much needed in order to deliver a planned supply of open market and affordable housing in both the urban and rural areas the coming years.</p> <p>Adopting a local plan that reflects up to date housing and economic development needs and allocates a sufficient amount of sites to meet those needs in the Newcastle-under-Lyme Borough is essential. The adoption of a robust Local Plan that allocates a sufficient amount of development land gives the Council a choice about where to meet its housing and economic development needs, creates certainty, and ensures that future needs can be achieved in a sustainable way and delivers the associated physical and social infrastructure that is required to support such development.</p> <p>Richborough therefore supports the preparation of a new Local Plan and provides a number of comments in relation to the proposed draft policies, in addition to providing support for draft allocation reference SP23 which our client has a legal interest in / control over. SP23 forms a part of the Council's Local Plan strategy to deliver sustainable growth around Keele University and Richborough wholeheartedly support this part of the Council's growth strategy.</p> <p>Whilst it is the case that the Government has recently consulted upon a revised NPPF, it is the Government's position that local authorities should continue to progress with the delivery of up-to-date local plans. Richborough therefore welcomes this consultation and supports the Council in its efforts in bringing forward a new Local Plan.</p> <p>Further to the above, Richborough are mindful of the transitional arrangements proposed in the draft revised NPPF for the purposes of plan-making.</p> <p>Annex 1 to the draft NPPF contains implementation provisions as follows:</p> <p>"For the purposes of plan-making</p> <p>226. The policies in this Framework (published on [publication date]) will apply for the purpose of preparing local plans from [publication date + one month] unless one or more of the following apply:</p> <p>a. the emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure;</p> <p>b. the local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework;</p> <p>c. the local plan is or has been submitted for examination under Regulation 22 on or before [publication date + one month].</p> <p>Where a, b or c applies, the plan will be examined under the relevant previous version of the Framework.</p> <p>227. Where paragraph 226 c) applies, local plans that reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant published Local Housing Need figure will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.</p> <p>228. After applying the policies of this version of the Framework, local plans that have reached Regulation 19 (pre-submission stage) on or before [publication date + one month] with an emerging annual housing requirement that is more than 200 dwellings lower than the relevant Local Housing Need figure should proceed to examination within a maximum of 18 months from [publication date].</p> <p>229. For Spatial Development Strategies, this Framework applies to strategies that reach consultation under section 335(2) of the Greater London Authority Act 1999 on or after [publication date + one month]. Strategies that reach this stage on or before this date will be examined under the relevant previous version of the Framework."</p> <p>Accompanying this submission is a Counsel opinion from David Manley KC (Appendix 1). This sets out that the draft Regulation 19 Local Plan for Newcastle-under-Lyme would fall squarely within exception 226(a) (as the annual housing requirement proposed in the Regulation 19 Plan is less than 200 dwellings than the Local Housing Need figure) and that the plan as currently proposed should proceed to examination. Further to this, Government Guidance on the issue of transitional arrangements provided with the consultation document: "Proposed reforms to the National Planning Policy Framework and other changes to the planning system" (updated 2nd August 2024) states, inter alia:</p> <p>"Transitional arrangements for emerging plans in preparation</p> <p>4. We propose transitional arrangements to maintain the progress of plans at more advanced states of preparation, while maximising proactive planning for the homes our communities need. These will apply differently depending on what stage of preparation the plan has reached and the extent to which it is meeting the Government's housing growth aspirations. These transitional arrangements are set out in Annex 1 of the NPPF and outlined below</p> <p>6. To help local planning authorities with advanced plans to proceed to examination at pace and support the Government's ambition to build more homes, those plans that have reached Regulation 19 publication stage but not yet been submitted for examination one month after the revised framework is published, with a gap of no more than 200 dwellings per annum between the local planning authority's revised LHN</p>



	<p>figure and its proposed housing requirement (as set out in the Publication version of the plan), should also progress to examination under the version of the NPPF it has used when preparing the plan thus far.”</p> <p>The whole purpose of the transitional provisions as drafted is to strike a pragmatic balance between the need to increase housing provision on the one hand and the need to achieve Local Plan coverage and avoid wasted time and expense on the other.</p> <p>The advice from Counsel goes on to state that if the NPPF is issued in its draft form then it is an important material consideration and unless local circumstances clearly indicated a need to depart from NPPF advice it is the Government’s (and PINS’) expectation that it will be applied. It is therefore our position that the Newcastle-under-Lyme Regulation 19 Plan can be submitted for examination.</p> <p>Knights, on behalf of Richborough, would like to participate in the examination hearings in response to the various policies and allocations for which representations are made in this submission.</p> <p>The DLP includes a list of 12 strategic objectives. Strategic Objectives SO-III, SO-V, SO-V1 are relevant to the delivery of open market and affordable housing and seek to deliver a higher mix of residential uses into existing town centres, provide a mix of housing types across the Borough, and to support the vitality of rural villages by improving affordability and to provide choice in housing types for local people.</p> <p>2.2 Richborough generally supports the above objectives.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a> <a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP727
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan (“DLP”) consultation. Please also refer to attached representations. This policy seeks to promote safe, healthy and active lifestyles. Whilst there is no objection to the principles behind this policy per se, it is considered that there is some of the requirements of this policy are unnecessary and over-burdensome, particularly on small and medium size developers.</p> <p>There is no evidence to suggest that building new housing results in unacceptable health impacts, and major developments are often subject to other requirements and assessments, such as providing travel plans to encourage the use of non-car modes of transport, design policies that promote walking and cycling, design policies that require the provision of greenspace and usable areas of public open space, policies that require sites to be located in close proximity to services and facilities and other policies that promote active travel. These are all matters which are often covered within submitted transport assessments and design and access statements and are also issues considered at the design review stage.</p> <p>In addition, other validation requirements will also assess proposals with regard to air quality, noise and other environmental matters.</p> <p>New housing developments are unlikely to result in adverse impacts on health and wellbeing of themselves and it is considered that the need to provide a health impact assessment for residential development proposals is unnecessary. It is therefore proposed that this aspect of Policy PSD6 is removed as it would be an unnecessary duplication of process and a duplication of information provided within other technical assessments that usually form part of a planning application submission.</p> <p>Summary of recommendations:</p> <p>(a) Remove criteria c of the policy which requires a health impact assessment. Such matters are adequately covered by other validation requirements and other policies.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richrough Appendix 2 - Illustrative Concept Plan.pdf</a>



	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a>
<b>Comment ID</b>	NULLP731
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations. Richborough do not have any objections in principle to policy CRE 1.</p> <p>Otherwise, SP23 can deliver green and blue infrastructure and tree planting measures as also required by this policy</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference SP23.
<b>Attachments</b>	<a href="#">1342229 Richborough SP23 Cemetery Road.pdf</a> <a href="#">1342229 Richborough Appendix 2 - Illustrative Concept Plan.pdf</a> <a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP735
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail.</p> <p>The Council's overall development strategy seeks to deliver a minimum of 8,000 dwellings over the plan period at 400 dwellings per annum. At Regulation 18 stage, the Council sought to deliver 7,160 dwellings over the plan period (358 dwellings per annum).</p> <p>At Regulation 18 stage, we argued on behalf of Richborough that the housing requirement should be higher on the basis that the affordable housing need identified at that time (278 affordable homes per annum) amounted to around 77% of the housing requirement.</p> <p>As such, the increase of the requirement to 400 dwellings per annum is welcome and is supported, however the annual affordable housing need still equates to around 69% of the annual housing requirement for Newcastle-under-Lyme.</p> <p>The expression of the housing requirement as a minimum starting point is welcome.</p> <p>Given the high level of affordable housing need and the Council's aspirations to deliver economic growth, it is considered that the increase in the annual housing requirement is justified by the evidence and is therefore sound.</p> <p>It is therefore suggested that as a minimum, all of the proposed allocations identified in the current DLP must be retained in order to ensure that the housing requirement can be delivered over the plan period.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP739
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. This policy seeks to promote safe, healthy and active lifestyles. Whilst there is no objection to the principles behind this policy per se, it is considered that there is some of the requirements of this policy are unnecessary and over-burdensome, particularly on small and medium size developers.</p> <p>There is no evidence to suggest that building new housing results in unacceptable health impacts, and major developments are often subject to other requirements and assessments, such as providing travel plans to encourage the use of non-car modes of transport, design policies that promote walking and cycling, design policies that require the provision of greenspace and usable areas of public open space, policies that require sites to be located in close proximity to services and facilities and other policies that promote active travel. These are all matters which are often covered within submitted transport assessments and design and access statements and are also issues considered at the design review stage.</p> <p>In addition, other validation requirements will also assess proposals with regard to air quality, noise and other environmental matters.</p> <p>New housing developments are unlikely to result in adverse impacts on health and wellbeing of themselves and it is considered that the need to provide a health impact assessment for residential development proposals is unnecessary. It is therefore proposed that this aspect of Policy PSD6 is removed as it would be an unnecessary duplication of process and a duplication of information provided within other technical assessments that usually form part of a planning application submission.</p> <p>Summary of recommendations:</p> <p>(a) Remove criteria c of the policy which requires a health impact assessment. Such matters are adequately covered by other validation requirements and other policies.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a>
<b>Comment ID</b>	NULLP743
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Family Name</b>	Richborough Estates
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q5 Legally compliant</b>	Yes

<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	This representation is submitted on behalf of Richborough in response to the Newcastle-under-Lyme Draft Local Plan ("DLP") consultation. Please also refer to attached representations for further detail. Richborough do not have any objections in principle to policy CRE 1. Otherwise, TB19 can deliver green and blue infrastructure and tree planting measures as also required by this policy.
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Richborough for allocation reference TB19
<b>Attachments</b>	<a href="#">1342229 Richborough Appendix 1 - NPPF Transition.pdf</a> <a href="#">1342229 Appendix 2 - Promotional Document TB19.pdf</a> <a href="#">1342229 Richborough TB19 Whitmore Road.pdf</a>

<b>Comment ID</b>	NULLP1471
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Richmond
<b>Consultee Given Name</b>	Christine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1472
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Richmond
<b>Consultee Given Name</b>	Christine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1365
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Rigby
<b>Consultee Given Name</b>	Jayne
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1418
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Rigby
<b>Consultee Given Name</b>	Jayne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>A lot of time and research has gone into completing this report. As a consequence, the objections raised are valid and vey concerning to a resident in the area. I am expecting on equally detailed response form from the council to each point raised.</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1162
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Riley
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>The policy relating to AB33, Land off Nantwich Road and Park Lane Audley is sound and should be scrapped.</p> <p>Traffic through the village has increased over the years to unacceptable levels for a B road (B5500) and village streets. This development would be too much for the area. Parking is already a problem in Audley and Bignall End, this would take it to even worse levels.</p> <p>A5500 is already a 'rat run' for traffic diverted from Betley going to the M6/A500 and Newcastle any extra traffic would be unsustainable the sewers along Nantwich Road and Park Lane are old (victorian) and would not be able to cope with the extra volume due to more houses. We have problems with system already.</p> <p>Water treatment overflows were over 900 in 2023 this development would increase these.</p> <p>The land floods regularly in bad weather so any developer would need to deal with this leading to extra costs making the 20% profit the developers are entitled to unviable. This in turn would put pressure on the number of affordable houses built.</p> <p>Schools in the area, both primary and secondary are already over subscribed so extra demand would cause more problems for them. For these reasons the plan at AB33 is unjustifiable and unsound.</p>
<b>Q7 Modification</b>	AB33 should be scrapped altogether
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1140
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Riley
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.8
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>This policy relating to 13.8 re land AB2 is unsound. It cannot justify removing 80ha of good arable greenfield land in a Green Belt for 22ha of employment land. The site is 4 times the size the Council says it needs it is unrealistic and would lead to more houses being required.</p> <p>The only transport links to the site are roads so it would lead to extra car journeys by employees and extra HGV &amp; Van journeys to the sites. This means extra noise and air pollution along with increased CO2 emissions. Also more traffic through our village which already gets very bust.</p> <p>Traffic levels on the M6 and A500 are already high it is unrealistic to think that AB2 will have little effect on this. Queues are about 2 miles long southbound on M6 to junc16 at times and not always rush hour (I've seen it at 10am on a wednesday) Also queues can be found from the A34 roundabout to Junc 16 on the A500.</p> <p>Even more traffic and another junction on the A500 would make the A500 and surrounding minor roads very congested. The B5500 is already a 'rat run' to Newcastle and the M6. This would make it worse.</p> <p>AB2 should be scrapped altogether. It is more accessible to Crewe than Newcastle and therefore more likely to benefit people from Crewe.</p>
<b>Q7 Modification</b>	AB2 should be scrapped.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1152
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Riley
<b>Consultee Given Name</b>	Belinda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>AB33 Land off Nantwich Road/ Park Lane Audley</p> <p>I object to this development of Greenbelt land. The traffic through Audley has increased over the years and anymore would be far too much. The parking even now is causing problems in the village especially for disabled, older people and people with pushchairs / children.</p> <p>Nantwich Road B5500 is already a 'rat run' for traffic to Newcastle from A531 partly due to being directed away from Betley/Wrinehill. We have problems with sewars on Nantwich Road + Park Lane. They are old and will not cope with extra input from a substantial number of new homes. Water treatment overflows were 900 in 2023. This development would make it worse. The land floods regularly in wet weather so the developer would have to mitigate this. This would lead to extra cost &amp; would make it profit less than 20%. This would put pressure on the number of affordable homes to be built. My main concern is traffic increase + how they will all get on &amp; off the site.</p>
<b>Q7 Modification</b>	Remove AB33 from Local Plan
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1156
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Riley
<b>Consultee Given Name</b>	Belinda
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The site AB2is 80 hectares of greenbelt land removed for 22 hectares of required employment land needed. This increased size would need even more housing. The site has only transport links via the A500; there would be more congestion on this already busy road and more pollution &amp; noise an increased CO2 &amp; tyre pollution + extra traffic through our villages, Traffic levels are already high with long queues from Junction 16 to &amp; from A500 (queues regularly back up onto M6 to get off at Junction 16)</p> <p>The area around AB2 is used by many people for walking, cycling &amp; jogging and it will be dangerous with more cars going along the lanes to access the site when they can't get to it via the A500</p>
<b>Q7 Modification</b>	<p>I would suggest that AB2 is removed from the Local Plan</p> <p>There are already warehouses in Alsager (other side of A500) and these are still unoccupied so use these first. This area is greenbelt and should stay as greenbelt</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP468
<b>Order</b>	48
<b>Title</b>	Policy HOU4: Gypsy, Travellers and Travelling Showpeople
<b>Consultee Family Name</b>	Ritchie
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU4
<b>Q6 Details</b>	<p>Reference is given to a GTAA for 2024. As a retired member of the travelling community now settled in this area for the last 3 yrs,( I also have historic ties to this area) I was not approached for the completion of the GTAA and I know of others in the travelling community that were also not approached. Therefor the figures for the stated and most recent GTAA are incorrect and incomplete.</p> <p>Furthermore, anonymous representations are barred leaving many travelers residing in the area without a voice fearing further persicution from both local authorities and discriminatory groups also residing in this area</p> <p>Local councils throughout England including NuL have kicked the can down the road for far to long providing the bare minimum for the traveling community leaving many of those still wishing to travel either forced into 'settlement camps' where residents feel unable to move on even if they wish to do so because on return they may find themselves no longer having a pitch to use. Forced onto illegal or roadside camps were they recieve further persecution from locals and local authorities alike.</p> <p>Often, the traveller sites that are, reluctantly provided, are hidden away near landfill, industrial areas and other undesirable locations and, again, NuL is no exception</p> <p>Furthermore, a new wave of Nomadic people have been rapidly growing over the past 10 yrs for which no account or provision has been made.</p> <p>The economic nomad often refered to as "Vanlifers"</p> <p>Many (but not all) of these have been forced out of bricks and mortar accomodation because of the presures of cost and availability of housing and other economic pressures</p> <p>I personally know of in excess of 50 of this type of traveller residing and working in this area, moving about from place to place. Some parking their vehicles at their place of work during the day and driving off in the evening parking in laybys and secluded spots for the evening.</p> <p>Again, many of these folk wish to remain hidden and anonymous so as not to draw attention to themselves because of the very real threat of persecution by local authorities</p> <p>The 2024 GTAA was incorrectly carried out and incomplete and, therefor, is unsound.</p>
<b>Q7 Modification</b>	<p>A propper GTAA needs to be carried out with liason from all the Nomadic groups in this area with proper consideration for needs and requirements for the varrying groups of Nomadic peoples within the community Representations, at the very least, need to be sought from the travelling community involving all groups Ideally liason officers should be sought from the travelling community and not rely on illinformed and uneducated officers from within the local council</p> <p>To exclude ethnic minority groups from the Local Plan would be discriminatory and, therefor, the Local Plan cannot and should not be considered for adoption until such time as a sound and complete GTAA has been executed</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As a member of the travelling community for over 45yrs as a chosen lifestyle and a (retired) travelling Showman I feel that I can give some insite into the requirements and needs of my lifestyle as well as integration, as opposed to the ostracisation, of nomadic peoples into settled communities
<b>Comment ID</b>	NULLP469
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Ritchie
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>This land consists of approx 80hectars of good quality agreicultural land within the green belt. The proposal is to take this from greenbelt and develop it for industrial use supposedly providing in excess of 3000 jobs</p> <p>The first, obvious, question is from were will these positions be funished from?</p> <p>Certainly not from the surrounding villages. we do not have the unemployed population. Therefor, these positions will realistically be filled from the larger surrounding area.</p> <p>That will mean placing more pressure from the, already at best, barley adequate transport infrastructure.</p>



	<p>In reality it will mean our country lanes that are used for recreational and farming activities and often not wide enough for 2 vehicles to pass will become a rat race for those late for work, in a hurry to get home or just avoiding the inevitable traffic snarl ups created by RTi's causing a life threatening hazard to local community road users.</p> <p>Junction 16 of the M6 with the A500 is already a well known hot spot for RTi's and it would seem that only a passing consideration has been given to the potential problems that adding more pressure by the need for hundreds of large comercial vehicles needing to exit and enter the motorway system at this junction due to the addition of an 80+hecter industrial site.</p> <p>Add to this the 1000's of extra domestic vehicles in the area and it is easy to see why this preposturous proposal is both unrealistic and unsound</p> <p>The second most obvious question is WHY!?</p> <p>Why, when there is ample vacent warehousing and other industrial premisses in the imediate surrounding area</p> <p>We are not talking a little industrial estate here we are talking about an area that could swallow both Audley and Bignall End probably with room to spare.</p> <p>Furthermore, little or no considerations appears to have been given to the health hazard to local residents and only a passing consideration to the green issues. We, as a nation, are supposed to be decreasing our carbon footprint not increasing it. If this development is allowed to go ahead, who is NuL Council going to persuade to by the excess inorder to make them look good in the public eye?</p> <p>This propstal is unnecessary, ill thought out, under researched and would devistate the local area and, therefor, unsound</p>
<b>Q7 Modification</b>	<p>I don't think that this plan in it's entirety could be made sound</p> <p>There are to many anomillies</p> <p>Too many poorly prepared proposals</p> <p>Too many ommisions</p> <p>Too much abuse and missuse of data</p> <p>I could go on</p> <p>Certainly, the proposal for AB2 needs nothing less than scrapping</p> <p>I came to this table late as I was unaware of the existance of the proposed plan but I am horrified!</p> <p>Having been involved with a number of local councils and heavily involved (local Leader) in a prominent political party in the past, this is the worst pile of garbage I have ever seen.</p> <p>I have picked on 2 major issues directly related to my local parish but this whole document is questionable to say the least</p> <p>Further industrial development is unnecessary while there are more than enough vacent properties in the area</p> <p>I am not privy to the housing figures but I strongly suspect that the number of vacent, unused and under developed properties in the area would go a long way to filling the requirements in the near future. I shall now make it a mission to furnish myself with these figures</p> <p>There is only a passing mention to infrastuctures like education and health let alone other facilities</p> <p>This council would be better employed looking at ways to regenerate existing assets in the area rather than waisting their time and tax payers money coming up with harebrained scemes that are unrealistic and unsustainable. Designed to devistate local communities that are, themselves dedicated to the communities in which they reside providing usefull services and produce which our local, esteemed, council enjoy along with the larger surrounding communities</p> <p>Someone needs to wake up and smell the coffee</p> <p>On a 'GREEN' note: from this document, our council needs to think again about development plans and come up with something that will eventually help the local society not make things harder for generations to come. Start thinking about long term impact not short term gain</p>

<b>Comment ID</b>	NULLP910
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Company / Organisation</b>	Protect Audley Parish Green Belt Group
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Gary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1.0 INTRODUCTION</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.0 PSD1</p> <p>2.1 The housing target is too high and will negatively impact on the weaker housing markets in the borough and nearby settlements. It will also reduce the amount of valuable agricultural land in the green belt.</p> <p>2.2 The following tables, with numbers taken from ONS, show that both population growth and households growth are historically low in the borough :</p> <p>(TABLES ATTACHED IN FILE)</p> <p>2.3 The Local Plan has set a target of 8,663 new dwellings over a two decade period. Council tax records indicate that there are 57,627 dwellings in the borough, so the target is for a 15% increase over a two decade period. This will undermine the weaker housing markets in the borough and nearby settlements</p> <p>2.4 The cost of housing in the borough is low by national standards (ONS figures for 2023 show that the average earnings/house prices ratio is 5.52 in the borough and 4.12 in Audley. This compares to the national figure of 8.14).</p> <p>2.5 ONS figures comparing 2011 to 2021 show that the earning/house price ratio has been rising much slower in the borough compared to region and England:</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.6 Looking at some demographic data (which is ignored in the consultants reports) we can begin to understand why the population is not increasing. The table below shows the data taken from Nomis. For the years 2018 to 2021 the table shows live births and the issuance of national insurance numbers (NINOs), usually to migrants and the number of deaths. This shows that in 2020 and 2021 deaths outstripped births easily and hence population growth has been driven overwhelmingly by inward migration.</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.7 In the borough, there is a problem of under occupation (with an aging population) and empty properties. Adding more homes is only likely to worsen the over-supply and to draw in better off residents from Stoke-on-Trent, undermining the city's regeneration policies.</p> <p>3.0 AUDLEY RURAL PARISH</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records</p> <p>(TABLE AND MAP ATTACHED IN FILE)</p> <p>4.0</p> <p>4.1 At regulation 18, United Utilities noted that a "sewer passes through site which will need to be taken into consideration." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>4.2 At regulation 18, Natural England noted that the site is "adjacent to a traditional orchard and this should be taken into consideration. " This site is not mentioned in the Local plan. How was it taken into consideration?</p> <p>4.3 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>4.4 We are also disappointed that good agricultural land is being lost.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	6.0 EXAMINATION IN PUBLIC 6.1 We wish to be represented and speak at the examination in public. 6.2 To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Q10 File 1</b>	6389373
<b>Attachments</b>	1342312 Gary Roberts - REDACTED.pdf
<b>Comment ID</b>	NULLP908
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Company / Organisation</b>	Protect Audley Parish Green Belt Group
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Gary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1.0 INTRODUCTION</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.0 PSD1</p> <p>2.1 The housing target is too high and will negatively impact on the weaker housing markets in the borough and nearby settlements. It will also reduce the amount of valuable agricultural land in the green belt.</p> <p>2.2 The following tables, with numbers taken from ONS, show that both population growth and households growth are historically low in the borough :</p> <p>(TABLES ATTACHED IN FILE)</p> <p>2.3 The Local Plan has set a target of 8,663 new dwellings over a two decade period. Council tax records indicate that there are 57,627 dwellings in the borough, so the target is for a 15% increase over a two decade period. This will undermine the weaker housing markets in the borough and nearby settlements</p> <p>2.4 The cost of housing in the borough is low by national standards (ONS figures for 2023 show that the average earnings/house prices ratio is 5.52 in the borough and 4.12 in Audley. This compares to the national figure of 8.14).</p> <p>2.5 ONS figures comparing 2011 to 2021 show that the earning/house price ratio has been rising much slower in the borough compared to region and England:</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.6 Looking at some demographic data (which is ignored in the consultants reports) we can begin to understand why the population is not increasing. The table below shows the data taken from Nomis. For the years 2018 to 2021 the table shows live births and the issuance of national insurance numbers (NINOs), usually to migrants and the number of deaths. This shows that in 2020 and 2021 deaths outstripped births easily and hence population growth has been driven overwhelmingly by inward migration.</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.7 In the borough, there is a problem of under occupation (with an aging population) and empty properties. Adding more homes is only likely to worsen the over-supply and to draw in better off residents from Stoke-on-Trent, undermining the city's regeneration policies.</p> <p>3.0 AUDLEY RURAL PARISH</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records</p> <p>(TABLE AND MAP ATTACHED IN FILE)</p> <p>3.0 AB12</p> <p>3.1 At regulation 18, United Utilities noted "various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>3.2 At regulation18, Staffordshire County Council noted concerns about the access. It stated "Wide enough access to Diglake Street but issues regarding on street parking and increased traffic. Preferred access is B5500 but existing access is of insufficient wide in its present form."</p> <p>3.3 LP para 13.27 has not sufficiently addressed this problem unless. Whilst there is provision for off street parking on site AB12, most residents do not like parking their cars out of site. How will they be induced to use this parking area? The suspicion is that it is intended to force residents from parking</p>

	<p>outside their homes in Diglake Street, possibly by the introduction of double yellow lines? We strongly object to a Local Plan site that creates a problem, then disadvantages existing residents in order to remedy the problem that the Local Plan has made. Surely, this dilemma shows that the site is not appropriate for housing?</p> <p>3.4 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>3.5 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p> <p>4.0</p> <p>4.1 At regulation 18, United Utilities noted that a “sewer passes through site which will need to be taken into consideration.” However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>4.2 At regulation 18, Natural England noted that the site is “adjacent to a traditional orchard and this should be taken into consideration. “ This site is not mentioned in the Local plan. How was it taken into consideration?</p> <p>4.3 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>4.4 We are also disappointed that good agricultural land is being lost.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>6.0 EXAMINATION IN PUBLIC</p> <p>6.1 We wish to be represented and speak at the examination in public.</p> <p>6.2 To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.</p>
<b>Q10 File 1</b>	6389373
<b>Attachments</b>	<a href="#">1342312 Gary Roberts - REDACTED.pdf</a>
<b>Comment ID</b>	NULLP911
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Company / Organisation</b>	Protect Audley Parish Green Belt Group
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Gary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1.0 INTRODUCTION</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.0 PSD1</p> <p>2.1 The housing target is too high and will negatively impact on the weaker housing markets in the borough and nearby settlements. It will also reduce the amount of valuable agricultural land in the green belt.</p> <p>2.2 The following tables, with numbers taken from ONS, show that both population growth and households growth are historically low in the borough :</p> <p>(TABLES ATTACHED IN FILE)</p> <p>2.3 The Local Plan has set a target of 8,663 new dwellings over a two decade period. Council tax records indicate that there are 57,627 dwellings in the borough, so the target is for a 15% increase over a two decade period. This will undermine the weaker housing markets in the borough and nearby settlements</p> <p>2.4 The cost of housing in the borough is low by national standards (ONS figures for 2023 show that the average earnings/house prices ratio is 5.52 in the borough and 4.12 in Audley. This compares to the national figure of 8.14).</p> <p>2.5 ONS figures comparing 2011 to 2021 show that the earning/house price ratio has been rising much slower in the borough compared to region and England:</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.6 Looking at some demographic data (which is ignored in the consultants reports) we can begin to understand why the population is not increasing. The table below shows the data taken from Nomis. For the years 2018 to 2021 the table shows live births and the issuance of national insurance numbers (NINOs), usually to migrants and the number of deaths. This shows that in 2020 and 2021 deaths outstripped births easily and hence population growth has been driven overwhelmingly by inward migration.</p> <p>(TABLE ATTACHED IN FILE)</p> <p>2.7 In the borough, there is a problem of under occupation (with an aging population) and empty properties. Adding more homes is only likely to worsen the over-supply and to draw in better off residents from Stoke-on-Trent, undermining the city's regeneration policies.</p>

	<p>3.0 AUDLEY RURAL PARISH</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records</p> <p>(TABLE AND MAP ATTACHED IN FILE)</p> <p>4.0</p> <p>4.1 At regulation 18, United Utilities noted that a “sewer passes through site which will need to be taken into consideration.” However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>4.2 At regulation 18, Natural England noted that the site is “adjacent to a traditional orchard and this should be taken into consideration.” This site is not mentioned in the Local plan. How was it taken into consideration?</p> <p>4.3 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>4.4 We are also disappointed that good agricultural land is being lost.</p> <p>5.0 AB33</p> <p>5.1 At regulation 18, Staffordshire County Council stated that “off-site highways improvements likely to be required. Master plan to be supported with a Transport Assessment.” Yet no details of access have been provided. This is of particular importance as a previous planning application to create an access to the cemetery from Park Lane was refused on highway safety grounds.</p> <p>5.2 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>5.3 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>5.4 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	<p>6.0 EXAMINATION IN PUBLIC</p> <p>6.1 We wish to be represented and speak at the examination in public.</p> <p>6.2 To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.</p>
<b>Q10 File 1</b>	6389373
<b>Attachments</b>	<a href="#">1342312 Gary Roberts - REDACTED.pdf</a>

<b>Comment ID</b>	NULLP1309
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Audley Community Action Group
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Gary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the site AB2/AB2A being included in the Local Plan on the grounds that it is not sound, it can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>1.3 Consequently, AB2/AB2A should be removed from the Local Plan.</p> <p>2.0 ECONOMY</p> <p>2.1 The Newcastle Under Lyme Housing and Economic Needs Assessment Further Update of April 2024 (Turley) stated, at 8.15, that "between 43.1 ha and 83.0 ha of employment land could be needed throughout the borough between 2023 and 2040." This is based on an ambitious growth scenario significantly higher than the 63 ha upper limit indicated by the earlier HEDNA. It is noted that the Local Plan has stated in PSD1 that a minimum of 63 hectares of employment land is needed (turning the HEDNA maximum requirement to a minimum requirement).</p> <p>2.2 It further stated by Turley, at 8.22, that "This report's modelling suggests that there is unlikely to be surplus labour to support job growth beyond the baseline forecast."</p> <p>2.3 Yet the Local Plan is proposing 104.6 ha of employment land BW1 (6.499 ha), CT20 (7.51 ha), KL13 (11 ha), TC45 (0.29 ha), TC7 (1.63), KL15 (13 ha) and AB2 (22 ha), as outlined in Table N10 of the Regulation 19 Sustainability Appraisal Report of July 2024.</p> <p>2.4 What is more, the LP proposes to remove 80 ha from the Green Belt at AB2. Both the SHELAA and Reg 18 documents stated that the 70 ha site can accommodate 54.38 ha of employment land (with 15.62 ha for mitigation, etc). Since then, the site has been increased to 80 ha (AB2A). On the same proportions as at the Reg 18, the site has 61.76 ha of employment land and 18.24 ha of non-employment land for roads, lorry park and mitigation (the developers have noted that the lorry park will be 1.8 ha and the proposed strategic open space will be about 3.6 ha, both easily accommodated in the 18.24 ha).</p> <p>2.5 This means that the site will lead to an imbalanced Local Plan with 39.76 ha of employment land in excess of the 104.6 ha identified in the Local Plan and 61.36 ha above the highest figure that Turley's identified as needed in its April 2024 report.</p> <p>2.6 The Local Plan makes vague references to a sub-regional employment site but does not back this up with any details. Given that there are high employment rates in both the borough and adjacent authorities, and given that Turley has noted that "there is unlikely to be surplus labour to support job growth beyond the baseline forecast", any such site would need to draw employees from a far wider area (as the site promoter's agents, Hatch Regeneris, have stated "At a distance of one hour's commute by road, a Junction 16 location has access to an estimated population of 9 million spanning the southern side of Greater Manchester, Cheshire, the northern area of the Birmingham city region and the Black Country, the wider Potteries area and Derby."). This is not sustainable and will create more disbenefits to the borough than any benefits.</p> <p>2.7 Competing and underused employment sites in the area do underline how ambitious the 83 ha figure is (let alone 104.6 ha or the reality of 144.36 ha that includes the extra 39.76 ha of employment land on site AB2/AB2A). Neighbouring LPA employment sites that are nearby include Radway Green Brownfield (10 ha), Radway Green Extension (25 ha), Radway Green North (12 ha), Basford West (22ha) and Basford East (19 ha). Many of these sites are not yet fully developed or are vacant (see attachment)</p> <p>2.8 Indeed, a brief survey of empty employment sites within 10 miles of AB2/AB2A site show high vacancy rates (see attachment)</p> <p>2.9 In addition, there are potential small sites not included in the Local Plan, which raises the question of the efficacy of the site selection process. An example being this site (see attachment)</p> <p>3.0 GREEN BELT</p> <p>3.1 The ARUP Green Belt Site Review dated 16th July 2024 recommended excluding the sites from the process on the grounds that "Development would however represent a significant encroachment into the countryside and therefore removal of the site from the Green Belt could harm the overall function and integrity of the Green Belt" (pages 28 F2 and F4), yet the Borough Council has ignored this recommendation. As can be seen from the maps below, in terms of its importance to the integrity of the Green Belt, this site is in a strategically important gap between the urban areas of southern Cheshire East and the urban areas of north Staffordshire (see attachment)</p> <p>3.2 This site has been found to make a strong contribution to the Green Belt in a previous review (Staffordshire County Council commissioned Audley Parish Green Belt Review V 2.4 conducted by Urban Vision Enterprise CIC in August 2022). This review has not been considered by the LPA.</p> <p>3.3 AB2/AB2A will have a major adverse impact on the landscape according to the Newcastle under Lyme Landscape &amp; Visual Appraisal of March 2023. The conditions in proposed Policy AB2: 9) "with roads, buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area" and 13.19 "The height, scale and form of the development should reflect the character of the area ... The height of buildings should avoid breaking treed skylines" are not realistic and effective.</p>



The character of the area consists of small agricultural buildings and dwellings which are incompatible with industrial units and HGV parking. The promoter of the site has stated that it will include a 1m square feet big box warehouse, which will tower above trees. It also ignores the reality that many of the villages in the parish of Audley are on higher ground, looking down to the site. It is not possible to mitigate such a large site.

#### 4.0 SUSTAINABILITY & IMPACT ON LOCALITY

4.1 Table N10 of the Regulation 19 Sustainability Appraisal Report of July 2024 gives a higher score to an alternative growth scenario (option 6d), which did not include AB2/AB2A. This considered option 6b (the one chosen by the LPA) at 104.6 ha, yet the reality is that it provides 144.36 ha of employment land. Therefore, its negative impact will be greater than that envisaged in that report. When one looks at the negative impact the site will have on both the borough and neighbouring settlements, it cannot be regarded as sustainable development

4.2 The following issues raised by Natural England in response to Reg18 have not been adequately addressed:

"If this site is considered for release and allocation the following should be taken into account:

Our mapping system shows that some of the site is priority habitat- Good quality semi-improved grassland. We refer you to paragraph 179 of the National Planning Policy Framework

(NPPF<https://www.gov.uk/government/publications/national-planning-policy-framework--2> ).

Some of the site is best and most versatile land. See ALC report:

<http://publications.naturalengland.org.uk/publication/4792819662192640>. We refer you to paragraph 174b) National Planning Policy Framework

(NPPF<https://www.gov.uk/government/publications/national-planning-policy-framework--2> ).

Potential for air quality impacts on designated sites. For example Midland Meres & mosses Phase 2 RAMSAR/ Oakhanger Moss SSSI. This site is 2.6km away and within 200m of the M6 and is one of the many sites that could be impacted by development at this location. We refer you to paragraph 175

National Planning Policy Framework

(NPPF<https://www.gov.uk/government/publications/national-planning-policy-framework--2> )" [summarised in the First Draft Local Plan Regulation 18 Consultation Report 2024 pg 142]

4.3 AB2/AB2A sites are working farms with grade 3a and 3b land. Much of the 3b land has been used to encourage greater biodiversity with the landowner receiving Government funds (map of schemes on this site below). This site goes against proposed policy SE13 to protect the best and most versatile land. There are sites with lower quality land in the other identified growth scenario options. It also goes against proposed policies SE7 biodiversity net gain and SE8 protection of specific species (which the schemes above are designed to protect) and still does not address the potential impact on Oakhangar Moss (see attachment)

4.4 The Regulation 19 Sustainability Appraisal Report of July 2024 (Pg N37) identifies major impacts on flooding and natural resources & waste. This conflicts with proposed policy SE3 flood risk management. The September 2022 SHELAA noted that the flood zones on site contributed to the site not being deliverable or developable.

4.5 There are very high levels of asthma and high blood pressure in Audley, well above both borough and national levels. The M6, A500 and rat running traffic through Audley and Bignal End are highly likely to be strong factors here, particularly as traffic on the A500 is idling at peak times. As noted in proposed policy SE1 there is a "cumulative effect" on pollution, including air quality and noise. Whilst proposed policy PSD 6 will require a health impact assessment, it is felt that this should be undertaken before such a large amount of greenfield is taken out of the Green Belt and significantly higher traffic generated. After all, if the assessment shows that proposed uses on the site will result in unacceptably high adverse impacts, we will have lost 80 ha of Green Belt for no good reason.

4.6 Despite the proposed policy SE9 Historic Environment, the following issues raised by Historic England at Regulation 18 have not been adequately addressed: a need to "consider the impacts to nearby heritage assets including Audley Mill Grade II, Audley Conservation Area and heritage assets within." [First Draft Local Plan Regulation 18 Consultation Report 2024 pg 138] The high level of rat running at present, including unsuitable HGVs, is having a detrimental impact on the Conservation Area. Photos below illustrate the damage done by HGVs. This will be exacerbated if AB2/AB2A goes ahead, displacing more traffic onto the local roads (see attachment)

4.7 The inclusion of emergency access points and pedestrian access points on the narrow country lanes surrounding the AB2/AB2A site will have a detrimental impact on those lanes. Designating an access for emergency use only is very difficult to enforce (witness the large number of vehicles that illegally use the Sandbach Services service roads to access the A533). Also, people will use these roads to drop employees off at the pedestrian access points and some employees may, if running late, park up on the verges of these lanes to walk in. This will conflict with proposed policy IN4 Cycleways, Bridleways and Public Rights of Way as these lanes connect many Public Rights of Way (see map below). These lanes are also widely used by walkers, cyclists and horse riders (there being only one Bridleway in the parish) for leisure and exercise (see attachment)

4.8 Indeed, many businesses benefit from these rural lanes as visitors who use these lanes go onto local pubs and restaurants. There is a B&B and a dog "hotel" on these lanes, with horse riding establishments nearby. Proposed policy RUR1 rural economy seeks to protect and promote these businesses and conflicts with AB2/AB2A.

4.9 Residents regularly experience long queues on the A500 at peak times. These queues often tailback to the Audley junction and, at times, have tailed back beyond the Talke junction (see attachment) Traffic regularly backs up beyond the Audley/Alsager A500 junction (often beyond the Cross Lane bridge) at peak times (see attachment)

There are times when traffic backs up all the way from junction 16 of the M6 to the Talke junction A500/A34. Photographs taken from the Talke Road bridge.

4.10 National Highways have stated that they recognise the problems but have not undertaken studies to ascertain the severity and thus the remedies: "We are aware of peak hour queueing on the A500(T). However, as there was a pinchpoint scheme in 2014/15 it has not reached the top of the priority list for further study." [in FOI response in attachment)

	<p>4.11 The congestion at this junction was raised as a concern by Cheshire East Council, Audley Rural Parish Council, Alsager Town Council, Balterly, Betley and Wrinehill Parish Council and Barthomley Parish Council at Regulation 18. 4.12 Cheshire East Council identified the need to improve this junction in its Local Plan. However, due to the cancellation of HS2 amongst other things, it has now suspended plans to dual carriage the A500 west of the junction (see attachment)</p> <p>4.13 LUC's Infrastructure Delivery Plan of July 2024 recognises the problems at this junction: "3.34 The most immediate priorities (within the next 10 years, aligning with the third and fourth roads investment period (RIS3 and RIS4) identified are: Strategic improvements to M6 J15 to resolve congestion, improve safety and facilitate better flow of traffic on M6 and A500. This has been suggested for submission to RIS3." [pg 50]</p> <p>4.14 Aspinall Verdi's Strategic Employment Sites Assessment 2024 Update makes an assumption that there will be funds for junction 16 as a result of the cancellation of HS2: "6.9 The UK government has hinted that the £4.7bn earmarked for HS2 projects in Manchester and Leeds will now be redirected to transport initiatives in smaller towns and cities across the North of England and Midlands."</p> <p>4.15 It is clear from statements made by the Treasury that the Government's finances are in a poor state with many capital projects being cancelled. There is no HS2 pot of gold.</p> <p>4.16 National Highways has no current plans to improve junction 16 (Midlands capital projects below) (see attachment)</p> <p>4.17 As a result of the problems on the A500, many vehicles rat run through the villages in the parish. This will increase if AB2/AB2A goes ahead. The Ab2/AB2A site conflicts with the proposed policy IN2 where sites should a) "be located where travel can be minimised and are not car dependent ...e) Not cause unacceptable highway safety problems in relation to local traffic circulation ... f) not cause severe residual impacts on the road network, either direct and/or cumulative."</p> <p>4.18 From observation by residents, the following rat running routes have been identified (see attachment)</p> <p>4.18 We have commissioned a review of the Strategic Transport Assessment which follows and forms part of our representation on the Local Plan (see attachment)</p>
<b>Q7 Modification</b>	See attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364611 G Roberts.pdf</a>
<b>Comment ID</b>	NULLP1305
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Audley Community Action Group
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Gary
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the site AB2/AB2A being included in the Local Plan on the grounds that it is not sound, it can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>1.3 Consequently, AB2/AB2A should be removed from the Local Plan.</p> <p>2.0 ECONOMY</p> <p>2.1 The Newcastle Under Lyme Housing and Economic Needs Assessment Further Update of April 2024 (Turley) stated, at 8.15, that "between 43.1 ha and 83.0 ha of employment land could be needed throughout the borough between 2023 and 2040." This is based on an ambitious growth scenario significantly higher than the 63 ha upper limit indicated by the earlier HEDNA. It is noted that the Local Plan has stated in PSD1 that a minimum of 63 hectares of employment land is needed (turning the HEDNA maximum requirement to a minimum requirement).</p> <p>2.2 It further stated by Turley, at 8.22, that "This report's modelling suggests that there is unlikely to be surplus labour to support job growth beyond the baseline forecast."</p> <p>2.3 Yet the Local Plan is proposing 104.6 ha of employment land BW1 (6.499 ha), CT20 (7.51 ha), KL13 (11 ha), TC45 (0.29 ha), TC7 (1.63), KL15 (13 ha) and AB2 (22 ha), as outlined in Table N10 of the Regulation 19 Sustainability Appraisal Report of July 2024.</p> <p>2.4 What is more, the LP proposes to remove 80 ha from the Green Belt at AB2. Both the SHELAA and Reg 18 documents stated that the 70 ha site can accommodate 54.38 ha of employment land (with 15.62 ha for mitigation, etc). Since then, the site has been increased to 80 ha (AB2A). On the same proportions as at the Reg 18, the site has 61.76 ha of employment land and 18.24 ha of non-employment land for roads, lorry park and mitigation (the developers have noted that the lorry park will be 1.8 ha and the proposed strategic open space will be about 3.6 ha, both easily accommodated in the 18.24 ha).</p> <p>2.5 This means that the site will lead to an imbalanced Local Plan with 39.76 ha of employment land in excess of the 104.6 ha identified in the Local Plan and 61.36 ha above the highest figure that Turley's identified as needed in its April 2024 report.</p>

2.6 The Local Plan makes vague references to a sub-regional employment site but does not back this up with any details. Given that there are high employment rates in both the borough and adjacent authorities, and given that Turley has noted that "there is unlikely to be surplus labour to support job growth beyond the baseline forecast", any such site would need to draw employees from a far wider area (as the site promoter's agents, Hatch Regeneris, have stated "At a distance of one hour's commute by road, a Junction 16 location has access to an estimated population of 9 million spanning the southern side of Greater Manchester, Cheshire, the northern area of the Birmingham city region and the Black Country, the wider Potteries area and Derby."). This is not sustainable and will create more disbenefits to the borough than any benefits.

2.7 Competing and underused employment sites in the area do underline how ambitious the 83 ha figure is (let alone 104.6 ha or the reality of 144.36 ha that includes the extra 39.76 ha of employment land on site AB2/AB2A). Neighbouring LPA employment sites that are nearby include Radway Green Brownfield (10 ha), Radway Green Extension (25 ha), Radway Green North (12 ha), Basford West (22ha) and Basford East (19 ha). Many of these sites are not yet fully developed or are vacant (see attachment)

2.8 Indeed, a brief survey of empty employment sites within 10 miles of AB2/AB2A site show high vacancy rates (see attachment)

2.9 In addition, there are potential small sites not included in the Local Plan, which raises the question of the efficacy of the site selection process. An example being this site (see attachment)

### 3.0 GREEN BELT

3.1 The ARUP Green Belt Site Review dated 16th July 2024 recommended excluding the sites from the process on the grounds that "Development would however represent a significant encroachment into the countryside and therefore removal of the site from the Green Belt could harm the overall function and integrity of the Green Belt" (pages 28 F2 and F4), yet the Borough Council has ignored this recommendation. As can be seen from the maps below, in terms of its importance to the integrity of the Green Belt, this site is in a strategically important gap between the urban areas of southern Cheshire East and the urban areas of north Staffordshire (see attachment)

3.2 This site has been found to make a strong contribution to the Green Belt in a previous review (Staffordshire County Council commissioned Audley Parish Green Belt Review V 2.4 conducted by Urban Vision Enterprise CIC in August 2022). This review has not been considered by the LPA.

3.3 AB2/AB2A will have a major adverse impact on the landscape according to the Newcastle under Lyme Landscape & Visual Appraisal of March 2023. The conditions in proposed Policy AB2: 9) "with roads, buildings or structures designed to ensure they are not intrusive in significant views from the surrounding area" and 13.19 "The height, scale and form of the development should reflect the character of the area ... The height of buildings should avoid breaking treed skylines" are not realistic and effective. The character of the area consists of small agricultural buildings and dwellings which are incompatible with industrial units and HGV parking. The promoter of the site has stated that it will include a 1m square feet big box warehouse, which will tower above trees. It also ignores the reality that many of the villages in the parish of Audley are on higher ground, looking down to the site. It is not possible to mitigate such a large site.

### 4.0 SUSTAINABILITY & IMPACT ON LOCALITY

4.1 Table N10 of the Regulation 19 Sustainability Appraisal Report of July 2024 gives a higher score to an alternative growth scenario (option 6d), which did not include AB2/AB2A. This considered option 6b (the one chosen by the LPA) at 104.6 ha, yet the reality is that it provides 144.36 ha of employment land. Therefore, its negative impact will be greater than that envisaged in that report. When one looks at the negative impact the site will have on both the borough and neighbouring settlements, it cannot be regarded as sustainable development

4.2 The following issues raised by Natural England in response to Reg18 have not been adequately addressed:

"If this site is considered for release and allocation the following should be taken into account:

Our mapping system shows that some of the site is priority habitat- Good quality semi-improved grassland.

We refer you to paragraph 179 of the National Planning Policy Framework

(NPPF <https://www.gov.uk/government/publications/national-planning-policy-framework--2> ).

Some of the site is best and most versatile land. See ALC report:

<http://publications.naturalengland.org.uk/publication/4792819662192640>. We refer you to paragraph 174b) National Planning Policy Framework

(NPPF <https://www.gov.uk/government/publications/national-planning-policy-framework--2> ).

Potential for air quality impacts on designated sites. For example Midland Meres & mosses Phase 2 RAMSAR/ Oakhanger Moss SSSI. This site is 2.6km away and within 200m of the M6 and is one of the many sites that could be impacted by development at this location. We refer you to paragraph 175 National Planning Policy Framework

(NPPF <https://www.gov.uk/government/publications/national-planning-policy-framework--2> )" [summarised in the First Draft Local Plan Regulation 18 Consultation Report 2024 pg 142]

4.3 AB2/AB2A sites are working farms with grade 3a and 3b land. Much of the 3b land has been used to encourage greater biodiversity with the landowner receiving Government funds (map of schemes on this site below). This site goes against proposed policy SE13 to protect the best and most versatile land. There are sites with lower quality land in the other identified growth scenario options. It also goes against proposed policies SE7 biodiversity net gain and SE8 protection of specific species (which the schemes above are designed to protect) and still does not address the potential impact on Oakhangar Moss (see attachment)

4.4 The Regulation 19 Sustainability Appraisal Report of July 2024 (Pg N37) identifies major impacts on flooding and natural resources & waste. This conflicts with proposed policy SE3 flood risk management. The September 2022 SHELAA noted that the flood zones on site contributed to the site not being deliverable or developable.

4.5 There are very high levels of asthma and high blood pressure in Audley, well above both borough and national levels. The M6, A500 and rat running traffic through Audley and Bignal End are highly likely to be strong factors here, particularly as traffic on the A500 is idling at peak times. As noted in proposed policy SE1 there is a "cumulative effect" on pollution, including air quality and noise. Whilst proposed policy PSD 6 will require a health impact assessment, it is felt that this should be undertaken before such

a large amount of greenfield is taken out of the Green Belt and significantly higher traffic generated. After all, if the assessment shows that proposed uses on the site will result in unacceptably high adverse impacts, we will have lost 80 ha of Green Belt for no good reason.

4.6 Despite the proposed policy SE9 Historic Environment, the following issues raised by Historic England at Regulation 18 have not been adequately addressed: a need to "consider the impacts to nearby heritage assets including Audley Mill Grade II, Audley Conservation Area and heritage assets within." [First Draft Local Plan Regulation 18 Consultation Report 2024 pg 138] The high level of rat running at present, including unsuitable HGVs, is having a detrimental impact on the Conservation Area. Photos below illustrate the damage done by HGVs. This will be exacerbated if AB2/AB2A goes ahead, displacing more traffic onto the local roads (see attachment)

4.7 The inclusion of emergency access points and pedestrian access points on the narrow country lanes surrounding the AB2/AB2A site will have a detrimental impact on those lanes. Designating an access for emergency use only is very difficult to enforce (witness the large number of vehicles that illegally use the Sandbach Services service roads to access the A533). Also, people will use these roads to drop employees off at the pedestrian access points and some employees may, if running late, park up on the verges of these lanes to walk in. This will conflict with proposed policy IN4 Cycleways, Bridleways and Public Rights of Way as these lanes connect many Public Rights of Way (see map below). These lanes are also widely used by walkers, cyclists and horse riders (there being only one Bridleway in the parish) for leisure and exercise (see attachment)

4.8 Indeed, many businesses benefit from these rural lanes as visitors who use these lanes go onto local pubs and restaurants. There is a B&B and a dog "hotel" on these lanes, with horse riding establishments nearby. Proposed policy RUR1 rural economy seeks to protect and promote these businesses and conflicts with AB2/AB2A.

4.9 Residents regularly experience long queues on the A500 at peak times. These queues often tailback to the Audley junction and, at times, have tailed back beyond the Talke junction (see attachment) Traffic regularly backs up beyond the Audley/Alsager A500 junction (often beyond the Cross Lane bridge) at peak times (see attachment)

There are times when traffic backs up all the way from junction 16 of the M6 to the Talke junction A500/A34. Photographs taken from the Talke Road bridge.

4.10 National Highways have stated that they recognise the problems but have not undertaken studies to ascertain the severity and thus the remedies: "We are aware of peak hour queueing on the A500(T). However, as there was a pinchpoint scheme in 2014/15 it has not reached the top of the priority list for further study." [in FOI response in attachment)

4.11 The congestion at this junction was raised as a concern by Cheshire East Council, Audley Rural Parish Council, Alsager Town Council, Balterly, Betley and Wrinehill Parish Council and Barthomley Parish Council at Regulation 18. 4.12 Cheshire East Council identified the need to improve this junction in its Local Plan. However, due to the cancellation of HS2 amongst other things, it has now suspended plans to dual carriage the A500 west of the junction (see attachment)

4.13 LUC's Infrastructure Delivery Plan of July 2024 recognises the problems at this junction: "3.34 The most immediate priorities (within the next 10 years, aligning with the third and fourth roads investment period (RIS3 and RIS4) identified are: Strategic improvements to M6 J15 to resolve congestion, improve safety and facilitate better flow of traffic on M6 and A500. This has been suggested for submission to RIS3." [pg 50]

4.14 Aspinall Verdi's Strategic Employment Sites Assessment 2024 Update makes an assumption that there will be funds for junction 16 as a result of the cancellation of HS2: "6.9 The UK government has hinted that the £4.7bn earmarked for HS2 projects in Manchester and Leeds will now be redirected to transport initiatives in smaller towns and cities across the North of England and Midlands."

4.15 It is clear from statements made by the Treasury that the Government's finances are in a poor state with many capital projects being cancelled. There is no HS2 pot of gold.

4.16 National Highways has no current plans to improve junction 16 (Midlands capital projects below) (see attachment)

4.17 As a result of the problems on the A500, many vehicles rat run through the villages in the parish. This will increase if AB2/AB2A goes ahead. The Ab2/AB2A site conflicts with the proposed policy IN2 where sites should a) "be located where travel can be minimised and are not car dependent ...e) Not cause unacceptable highway safety problems in relation to local traffic circulation ... f) not cause severe residual impacts on the road network, either direct and/or cumulative."

4.18 From observation by residents, the following rat running routes have been identified (see attachment)

4.18 We have commissioned a review of the Strategic Transport Assessment which follows and forms part of our representation on the Local Plan (see attachment)

<b>Q7 Modification</b>	See attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364611 G Roberts.pdf</a>

<b>Comment ID</b>	NULLP48
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Family Name</b>	Roberts
<b>Consultee Given Name</b>	Michael
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	2.1
<b>Q6 Details</b>	<p>Before any houses are built the existing infrastructure needs to be dealt with, the nhs is at breaking point, the police are at full stretch as are the fire service, the doctors have long waiting lists same with the schools, local tips full capacity. Who's going to pay for more nurses..doctors..</p> <p>police..teachers..firemen..binmen..etc Roads cannot cope now with too much traffic and flooding, sewage wouldn't cope or water drainage in lower areas of silverdale. A large amount of the local population are elderly or nearing retirement, bungalows is what's needed. Are the Council prepared to pay for another Doctors Surgery/Schools/Bigger facilities for bin collection and then of course WHAT ABOUT the WILDLIFE? All this needs to taken in to account. Do I need to add that I am COMPLETELY AGAINST the sheer amount of houses.</p>



<b>Comment ID</b>	NULLP1411
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Round
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1355
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Round
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in</p>

	<p>our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP57
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Ian
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a O2 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles.</p> <p>Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock! Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want. Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>
<b>Comment ID</b>	NULLP61
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a O2 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles.</p> <p>Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock!</p>

	<p>Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want.</p> <p>Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>
<b>Comment ID</b>	NULLP58
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a O2 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles.</p> <p>Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock!</p> <p>Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want.</p> <p>Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>
<b>Comment ID</b>	NULLP62
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Rowley

<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a 02 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles. Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock! Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want. Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>
<b>Comment ID</b>	NULLP59
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a 02 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles. Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock! Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing</p>

	<p>the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want. Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>
<b>Comment ID</b>	NULLP60
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Ian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>We agree some housing needs to be built, but are the housing target needs accurate, is old information being used? The figures used predicted the population would increase, predictions were wrong – population levels have decreased. We DO NOT agree to large storage units being built, why is greenbelt land being suggested? when brownfield sites exist in the county. Is it because developers do not like to use brownfield sites due to the additional costs of preparing the land? greenbelt land is cheaper to build on – creating more profits. As you travel around there are many large empty storage units in and around the Newcastle/Stoke area. How many local people are expected to be employed by the proposed storage units or will the labour be from outside the parish? Greenbelt land is a carbon storage capture area and a O2 producer, soil and trees are the biggest collectors of carbon so concreting these areas will increase the carbon footprint. Where will the water go from millions of square meters of roofing, nature drains the land naturally. Areas in the Parish now flood which have never done in the past, due to changes in the global weather patterns. There will be disruption in the local area during and after construction with noise and light pollution also poor air quality due to the pollution created by more large vehicles.</p> <p>Audley Parish has contributed to the industrial past with sacrifices made by the land and its people. Audley Parish was built on a Victorian footprint to facilitate its industrial past, roads in the area were not designed to take the present traffic levels, so any increase in additional traffic would cause gridlock! Local services will not be able to cope with more people and utility services will be stretched to supply these new developments. Audley Parish would lose its identity, as a collection of small individual villages which have established over many centuries.</p> <p>The world is on a knife edge with climate change – lots of these little takes of greenbelt land are mounting up to be larger worldwide problems. These developments will lead to further climate change, thus changing the quality of our environment forever. Greenbelt land is there for everyone to enjoy when they want. Monitoring cameras were installed over one weekend to register the footfall using the public footpaths across the land. This small snapshot would not have given a true record of the usage and therefore should be dismissed as evidence when the developers present their case. Once greenbelt has been taken, there is no going back!</p> <p>If a small number of houses must be built then building affordable housing for local people is important, but developers don't like building these as there is very little profit to be made. Larger houses attract bigger profits for developers, but large housing attracts people from outside the area, who do not contribute to our local economy. They will use the easy access to the A500 and M6 to travel to work in the larger conurbation areas. If local people cannot afford the property being built, they will move away, thus destroying the future fabric of the local community.</p> <p>Remember: You don't want history saying you were the ones who destroyed the local area and left nothing for our children and grandchildren. Don't let your legacy be that you contributed to the increase of global warming!</p> <p>LIFE IS MORE IMPORTANT THAN PROFIT</p>



<b>Comment ID</b>	NULLP322
<b>Order</b>	202
<b>Title</b>	Policy SP2 Cheddar Drive, Silverdale
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP2
<b>Q6 Details</b>	I am contacting you regards to the proposed housing development as per the local plan 2020-2040. I feel the high school and doctors will not be able cope with new people coming to area. I also feel that it will my estate more busy Underwood road. You more stain on park road silverdale.
<b>Comment ID</b>	NULLP326
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	I am contacting you regards to the proposed housing development as per the local plan 2020-2040. I feel the high school and doctors will not be able cope with new people coming to area. I also feel that it will my estate more busy Underwood road. You more stain on park road silverdale.
<b>Comment ID</b>	NULLP323
<b>Order</b>	207
<b>Title</b>	Policy SP22 Former Playground off Ash Grove, Silverdale
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP22
<b>Q6 Details</b>	I am contacting you regards to the proposed housing development as per the local plan 2020-2040. I feel the high school and doctors will not be able cope with new people coming to area. I also feel that it will my estate more busy Underwood road. You more stain on park road silverdale.
<b>Comment ID</b>	NULLP324
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site 8
<b>Q6 Details</b>	I am contacting you regards to the proposed housing development as per the local plan 2020-2040. I feel the high school and doctors will not be able cope with new people coming to area. I also feel that it will my estate more busy Underwood road. You more stain on park road silverdale.
<b>Comment ID</b>	NULLP325
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Rowley
<b>Consultee Given Name</b>	Lesley
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11

**Q6 Details**

I am contacting you regards to the proposed housing development as per the local plan 2020-2040. I feel the high school and doctors will not be able cope with new people coming to area. I also feel that it will my estate more busy Underwood road. You more stain on park road silverdale.

<b>Comment ID</b>	NULLP821
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Salt
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Comment with reference to:</p> <p>FINAL DRAFT LOCAL PLAN - Policy BL18 Land at Clough Hall (pages 141 &amp; 142). Paragraphs 13.205 &amp; 13.206</p> <p>Whilst it is accepted that the Local Plan now appears to address objections previously raised from the initial consultation, it is necessary to comment further on the paragraphs concerning the risks of surface water flooding and site drainage. Paragraph 13.206 specifically calls for 'an effective drainage strategy' which is of ongoing associated concern with regards to Clough Hall Lake which has been neglected for many, many years by the Borough Council.</p> <p>Clough Hall Lake backs onto gardens of houses on Park Avenue. The Lake is understood to be part of an historic drainage system which takes water from the Leg O Mutton Lake adjacent to the propped BL18 Development. Water passes from this area through the Clough Hall Lake and down past St Thomas' Church and into the canal system. This drainage system is essential in minimising the risk of flooding.</p> <p>Despite numerous representations from local residents over the years the Borough Council has neglected to maintain the Clough Hall Lake which is now at risk of becoming overgrown, silted up. and choked with reeds. Trees have not been cut back for at least 30 years and no attempt has been made to clear weed and reeds as part of routine maintenance.</p> <p>It is hoped that any development proposals will take into consideration Clough Hall Lake as part of 'an effective drainage strategy' and the Borough Council recognise thier responsibility for the local environment and infrastructure. Action is necessary as part of this developement proposal.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1217
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Scott
<b>Consultee Given Name</b>	Carl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records (please see attachment)</p> <p>Audley discharges account for 47% of the Constituency's hours of discharge (907.07 of 1,925 hours) and 29.5% of the spills (135 of 458 spills). The highest of the six watercourses in the Constituency (please see attachment)</p> <p>3.1 At regulation 18, United Utilities noted "various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>3.2 At regulation 18, Staffordshire County Council noted concerns about the access. It stated "Wide enough access to Diglake Street but issues regarding on street parking and increased traffic. Preferred access is B5500 but existing access is of insufficient wide in its present form."</p> <p>3.3 LP para 13.27 has not sufficiently addressed this problem unless. Whilst there is provision for off street parking on site AB12, most residents do not like parking their cars out of site. How will they be induced to use this parking area? The suspicion is that it is intended to force residents from parking outside their homes in Diglake Street, possibly by the introduction of double yellow lines? We strongly object to a Local Plan site that creates a problem, then disadvantages existing residents in order to remedy the problem that the Local Plan has made. Surely, this dilemma shows that the site is not appropriate for housing?</p> <p>3.4 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>3.5 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p> <p>5.0 AB33</p> <p>5.1 At regulation 18, Staffordshire County Council stated that "off-site highways improvements likely to be required. Master plan to be supported with a Transport Assessment." Yet no details of access have been provided. This is of particular importance as a previous planning application to create an access to the cemetery from Park Lane was refused on highway safety grounds.</p> <p>5.2 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>5.3 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>5.4 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p>
<b>Q7 Modification</b>	Please see attachment
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364482 Carl Scott.pdf</a>
<b>Comment ID</b>	NULLP1216
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street

<b>Consultee Family Name</b>	Scott
<b>Consultee Given Name</b>	Carl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records (please see attachment)</p> <p>Audley discharges account for 47% of the Constituency's hours of discharge (907.07 of 1,925 hours) and 29.5% of the spills (135 of 458 spills). The highest of the six watercourses in the Constituency (please see attachment)</p> <p>3.1 At regulation 18, United Utilities noted "various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>3.2 At regulation 18, Staffordshire County Council noted concerns about the access. It stated "Wide enough access to Diglake Street but issues regarding on street parking and increased traffic. Preferred access is B5500 but existing access is of insufficient wide in its present form."</p> <p>3.3 LP para 13.27 has not sufficiently addressed this problem unless. Whilst there is provision for off street parking on site AB12, most residents do not like parking their cars out of site. How will they be induced to use this parking area? The suspicion is that it is intended to force residents from parking outside their homes in Diglake Street, possibly by the introduction of double yellow lines? We strongly object to a Local Plan site that creates a problem, then disadvantages existing residents in order to remedy the problem that the Local Plan has made. Surely, this dilemma shows that the site is not appropriate for housing?</p> <p>3.4 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>3.5 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p> <p>4.1 At regulation 18, United Utilities noted that a "sewer passes through site which will need to be taken into consideration." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>4.2 At regulation 18, Natural England noted that the site is "adjacent to a traditional orchard and this should be taken into consideration. " This site is not mentioned in the Local plan. How was it taken into consideration?</p> <p>4.3 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>4.4 We are also disappointed that good agricultural land is being lost.</p>
<b>Q7 Modification</b>	Please see attachment
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364482 Carl Scott.pdf</a>
<b>Comment ID</b>	NULLP1214
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Scott
<b>Consultee Given Name</b>	Carl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1

<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.0 PSD1</p> <p>2.1 The housing target is too high and will negatively impact on the weaker housing markets in the borough and nearby settlements. It will also reduce the amount of valuable agricultural land in the green belt.</p> <p>2.2 The following tables, with numbers taken from ONS, show that both population growth and households growth are historically low in the borough (see attachment)</p> <p>2.3 The Local Plan has set a target of 8,663 new dwellings over a two decade period. Council tax records indicate that there are 57,627 dwellings in the borough, so the target is for a 15% increase over a two decade period. This will undermine the weaker housing markets in the borough and nearby settlements.</p> <p>2.4 The cost of housing in the borough is low by national standards (ONS figures for 2023 show that the average earnings/house prices ratio is 5.52 in the borough and 4.12 in Audley. This compares to the national figure of 8.14).</p> <p>2.5 ONS figures comparing 2011 to 2021 show that the earning/house price ratio has been rising much slower in the borough compared to region and England (see attachment)</p> <p>2.6 Looking at some demographic data (which is ignored in the consultants reports) we can begin to understand why the population is not increasing. The table below shows the data taken from Nomis. For the years 2018 to 2021 the table shows live births and the issuance of national insurance numbers (NINOs), usually to migrants and the number of deaths. This shows that in 2020 and 2021 deaths outstripped births easily and hence population growth has been driven overwhelmingly by inward migration (see attachment)</p> <p>2.7 In the borough, there is a problem of under occupation (with an aging population) and empty properties. Adding more homes is only likely to worsen the over-supply and to draw in better off residents from Stoke-on-Trent, undermining the city's regeneration policies.</p>
<b>Q7 Modification</b>	Please see attachment
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364482 Carl Scott.pdf</a>
<b>Comment ID</b>	NULLP1218
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Scott
<b>Consultee Given Name</b>	Carl
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>1.1 Audley Community Action Group (PAPG) is a community interest company. The CIC exists to protect and enhance the Green Belt in the civil parish of Audley, with over 1,300 supporters.</p> <p>1.2 We strongly object to the high number of houses planned for the borough. Also, the allocation of sites AB12, AB15 and AB33 in the Local Plan. We do not believe the overall housing figures, nor the site selections are sound, they can neither be justified nor is it likely to be effective. The grounds for the exceptional case for removing the land from the Green Belt have not been met.</p> <p>2.1 The infrastructure of the parish is not adequate for the level of extra housing envisaged. There are existing problems with rat running through the villages and the local highways are struggling to accommodate the strain of the traffic. There is a severe parking problem in the centre of Audley and more cars will make this worse. No impact assessment has been made for these combined sites. This problem will be even greater if site AB2 remains in the Local Plan.</p> <p>2.2 There are flooding issues throughout the parish and the existing sewage system is inadequate, as shown by United Utilities records (please see attachment)</p> <p>Audley discharges account for 47% of the Constituency's hours of discharge (907.07 of 1,925 hours) and 29.5% of the spills (135 of 458 spills). The highest of the six watercourses in the Constituency (please see attachment)</p> <p>3.1 At regulation 18, United Utilities noted "various sewer assets and associated combined sewer overflow pass through this site which will be a constraint to development." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>3.2 At regulation 18, Staffordshire County Council noted concerns about the access. It stated "Wide enough access to Diglake Street but issues regarding on street parking and increased traffic. Preferred access is B5500 but existing access is of insufficient wide in its present form."</p>



	<p>3.3 LP para 13.27 has not sufficiently addressed this problem unless. Whilst there is provision for off street parking on site AB12, most residents do not like parking their cars out of site. How will they be induced to use this parking area? The suspicion is that it is intended to force residents from parking outside their homes in Diglake Street, possibly by the introduction of double yellow lines? We strongly object to a Local Plan site that creates a problem, then disadvantages existing residents in order to remedy the problem that the Local Plan has made. Surely, this dilemma shows that the site is not appropriate for housing?</p> <p>3.4 We are also astounded that a site judged to provide a strong contribution to the Green Belt has been chosen over sites that provide a moderate contribution.</p> <p>3.5 We are also disappointed that good agricultural land forming part of a County Council starter farm is being lost.</p> <p>4.0</p> <p>4.1 At regulation 18, United Utilities noted that a "sewer passes through site which will need to be taken into consideration." However, no assessment has been made to ascertain how this site will impact on the sewer system.</p> <p>4.2 At regulation 18, Natural England noted that the site is "adjacent to a traditional orchard and this should be taken into consideration. " This site is not mentioned in the Local plan. How was it taken into consideration?</p> <p>4.3 This site is at the bottom of a hill and there is a steep gradient from the site to village facilities. This is likely to reduce active travel.</p> <p>4.4 We are also disappointed that good agricultural land is being lost.</p>
<b>Q7 Modification</b>	Please see attachment
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	To illuminate the issues raised by further explaining our concerns, the reasons for them and what we would like changed.
<b>Attachments</b>	<a href="#">1364482 Carl Scott.pdf</a>

<b>Comment ID</b>	NULLP458
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Sharrock
<b>Consultee Given Name</b>	A
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I am writing to express my concerns about the policy for residential development at Marsh Parade, as outlined in Policy TC22. My primary concern is the lack of robust noise mitigation measures that could severely impact The Rigger, a well-established live music venue that contributes significantly to the cultural fabric of Newcastle-under-Lyme. While Policy TC22 includes a requirement for a noise and odour assessment (found on Page 155), it does not adequately address the specific risks posed to The Rigger, which is located in close proximity to the proposed development. As future residents move into these new dwellings, it is likely that they will file noise complaints against the venue. This could result in severe restrictions on The Rigger's ability to operate, leading to significant consequences for both the business and the local community that relies on it for live music and entertainment.</p> <p>Additionally, the policy does not appear to account for the "Agent of Change" principle as outlined in the National Planning Policy Framework (NPPF). This principle mandates that the developers, not existing businesses, are responsible for mitigating noise issues arising from new residential developments near existing venues. Without proper noise mitigation strategies and the inclusion of this principle in the proposal, The Rigger is at risk of facing unfair noise complaints, which could restrict or even force the venue to close.</p>

<b>Comment ID</b>	NULLP253
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Shaw
<b>Consultee Given Name</b>	Denise
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p><b>Local Plan BL18</b></p> <p>Dear Sirs,</p> <p>Having lived in this area for my entire life I most strongly oppose your proposed plan to develop 150 houses on the above land. You currently state 150 or is this just the first phase of your not yet disclosed future Plan ?</p> <p>The land has and should remain a Green Area and Playing fields for the local community, it has always been used as such for as long as I can remember. While we are pleased to hear the retention of the two pitches there are still many problems with regard to the infrastructure, amenities and access to this site. Your documents detail a most wonderful development and appear on paper to resolve many of the problems we have highlighted in the past, without specific detail. Unfortunately as yet no official plan or visual document of the area is available for our perusal and none of our questions regarding the problems we envisage have been answered until such time we have no option but to object !</p> <p>An additional problem to the building of properties on this land is as follows:</p> <p>Access:</p> <p>Where on earth do you plan access to this location ?</p> <p>Beech Drive, Park Avenue ,Unity Way, St Saviours Street, Mitchell Drive, are all nothing more that rat runs for Kidsgrove Traffic trying to avoid congestion and traffic lights when coming from Newcastle Road to Kidsgrove and vice versa ! Not to mention when there has been an accident on the motorway when everything comes to a complete standstill. Having lived in (redacted by admin) for the last 28 years, the volume and speed of traffic using this residential road has increased significantly, we have bungalows for the elderly sited here, also this road is used by the many children attending the local schools, there has been no form of traffic calming along this road as long as we have resided here, yet you plan to increase this volume and put these children and residents at risk. The state of the pavements and verges are a disgrace in this area, made worse by both residential and commercial vehicles parking on the pavements. Indeed we very often find it difficult to access our driveways due to such vehicles.</p> <p>Visit our area on a Kidsgrove Athletic Football Club Match Day when this and surrounding roads are totally blocked with visiting supporters cars and buses!</p> <p>Drainage:</p> <p>Residents of Beech Drive who's property back into BL18 Barneys Field/ Clough Hall Playing Fields have ongoing problems with their gardens being flooded, yet you are proposing to make it worse with this development.</p> <p>Facilities:</p> <p>Doctors, Schools, Dentist, Shops, Jobs &amp; Social activities :</p> <p>Try to get a Doctors Appointment! Talke, Butt Lane and Kidsgrove Doctors cannot accommodate the volume of people that already live here, yet you are planning to bring to a high volume of new residents to this area! If you are fortunate to get an appointment with the Doctor you can be directed to any one of the following surgeries Chesterton, Tunstall, Lyme Brook, Longton. Recently having waited 10 weeks for an urgent appointment for an Ultra Sound X-ray, only to be directed to Stafford !! The same is said for Dentists - have you tried to get NHS treatment from a Dentist in this area lately? Our Dentist is currently unable to accept any new patients, as I understand are others? Where is the improvement for these essential services detailed in the your plan?</p> <p>Schools: many primary schools in the area are over subscribed with 30 or more children in many classes, so where are the children living in these proposed houses going to go to school?</p> <p>Building 150 Properties with an average of 2.4 people to each property brings not just affordable housing to this area but a complete nightmare for not only those people buying them, but to the existing residents in the area, who are already suffering with lack of essential services and dangerous roads.</p> <p>Perhaps we are missing something and the planning does include a Dr Surgery a New Primary School a Dentist, Jobs for everyone more shops and other facilities and improved services ? But even that does not resolve the problem of additional traffic in an already congested area !</p> <p>This area including Kidsgrove is changing from a comfortable semi rural location into a concrete jungle, we need to save our Green Spaces and Plan sensibly for the sake of our community and it's needs. Indeed we are nothing more than the poor relations of Newcastle Borough Council or so it seems!!</p>

<b>Comment ID</b>	NULLP254
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Shaw
<b>Consultee Given Name</b>	Philip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p><b>Local Plan BL18</b></p> <p>Dear Sirs,</p> <p>Having lived in this area for my entire life I most strongly oppose your proposed plan to develop 150 houses on the above land. You currently state 150 or is this just the first phase of your not yet disclosed future Plan ?</p> <p>The land has and should remain a Green Area and Playing fields for the local community, it has always been used as such for as long as I can remember. While we are pleased to hear the retention of the two pitches there are still many problems with regard to the infrastructure, amenities and access to this site. Your documents detail a most wonderful development and appear on paper to resolve many of the problems we have highlighted in the past, without specific detail. Unfortunately as yet no official plan or visual document of the area is available for our perusal and none of our questions regarding the problems we envisage have been answered until such time we have no option but to object !</p> <p>An additional problem to the building of properties on this land is as follows:</p> <p>Access:</p> <p>Where on earth do you plan access to this location ?</p> <p>Beech Drive, Park Avenue ,Unity Way, St Saviours Street, Mitchell Drive, are all nothing more that rat runs for Kidsgrove Traffic trying to avoid congestion and traffic lights when coming from Newcastle Road to Kidsgrove and vice versa ! Not to mention when there has been an accident on the motorway when everything comes to a complete standstill. Having lived in (redacted by admin) for the last 28 years, the volume and speed of traffic using this residential road has increased significantly, we have bungalows for the elderly sited here, also this road is used by the many children attending the local schools, there has been no form of traffic calming along this road as long as we have resided here, yet you plan to increase this volume and put these children and residents at risk. The state of the pavements and verges are a disgrace in this area, made worse by both residential and commercial vehicles parking on the pavements. Indeed we very often find it difficult to access our driveways due to such vehicles.</p> <p>Visit our area on a Kidsgrove Athletic Football Club Match Day when this and surrounding roads are totally blocked with visiting supporters cars and buses!</p> <p>Drainage:</p> <p>Residents of Beech Drive who's property back into BL18 Barneys Field/ Clough Hall Playing Fields have ongoing problems with their gardens being flooded, yet you are proposing to make it worse with this development.</p> <p>Facilities:</p> <p>Doctors, Schools, Dentist, Shops, Jobs &amp; Social activities :</p> <p>Try to get a Doctors Appointment! Talke, Butt Lane and Kidsgrove Doctors cannot accommodate the volume of people that already live here, yet you are planning to bring to a high volume of new residents to this area! If you are fortunate to get an appointment with the Doctor you can be directed to any one of the following surgeries Chesterton, Tunstall, Lyme Brook, Longton. Recently having waited 10 weeks for an urgent appointment for an Ultra Sound X-ray, only to be directed to Stafford !! The same is said for Dentists - have you tried to get NHS treatment from a Dentist in this area lately? Our Dentist is currently unable to accept any new patients, as I understand are others? Where is the improvement for these essential services detailed in the your plan?</p> <p>Schools: many primary schools in the area are over subscribed with 30 or more children in many classes, so where are the children living in these proposed houses going to go to school?</p> <p>Building 150 Properties with an average of 2.4 people to each property brings not just affordable housing to this area but a complete nightmare for not only those people buying them, but to the existing residents in the area, who are already suffering with lack of essential services and dangerous roads.</p> <p>Perhaps we are missing something and the planning does include a Dr Surgery a New Primary School a Dentist, Jobs for everyone more shops and other facilities and improved services ? But even that does not resolve the problem of additional traffic in an already congested area !</p> <p>This area including Kidsgrove is changing from a comfortable semi rural location into a concrete jungle, we need to save our Green Spaces and Plan sensibly for the sake of our community and it's needs. Indeed we are nothing more than the poor relations of Newcastle Borough Council or so it seems!!</p>

<b>Comment ID</b>	NULLP1394
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Sherwood
<b>Consultee Given Name</b>	Tina
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1456
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Sherwood
<b>Consultee Given Name</b>	Tina
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be



	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p> <p>Additional Comments</p> <p>I understand that there is a shortage of suitable housing for first time buyers but there is land in Chesterton that has already been purchased but no one has built on yet</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP917
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Company / Organisation</b>	Shropshire Homes
<b>Consultee Family Name</b>	Shropshire Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Shropshire Homes currently has a land interest on the edge of Loggerheads on Mucklestone Wood Lane, and one site is proposed for allocation (LW53). This proposed allocation in the Regulation 19 Local Plan is supported.</p> <p>Draft Site Allocation LW53</p> <p>Shropshire Homes currently have an outline planning application for up to 150 dwellings that is subject to appeal. As set out in the introduction, the planning application was recommended for approval by officers with no technical objections and no objections from statutory consultees or other statutory bodies. The recommendation for approval was overturned by Members at the Council's planning committee. This site is identified as a draft allocation for around 130 dwellings (site reference LW53). In light of the outline planning application before the Council, it is suggested that the number of dwellings that the allocation can accommodate be increased to 150 dwellings instead of 130 dwellings and that this should be worded accordingly in the allocations policy.</p> <p>Therefore, the first sentence of the policy wording should be amended to:</p> <p>"Land at the corner of Mucklestone Wood Lane is allocated for residential development in the region of 150 dwellings"</p> <p>The above would reflect the actual capacity of the site that is being pursued through the planning application, and allows a degree of flexibility should the final number of dwellings vary to a marginal degree at reserved matters stage in the event that the appeal is allowed.</p> <p>Policy LW53 then lists a number of criteria that need to be addressed and each of these will be considered below in turn.</p> <p>Criteria 1</p> <p>Criteria 1 states that the requirements of Policy SA1 should be satisfactorily addressed. Policy SA1 sets out a number of requirements for the proposed site allocations and each will be assessed below.</p> <p>Master Plans</p> <p>A masterplan has already been provided to the Development Management section of the Council as part of application reference 23/00002/OUT setting out how the site can deliver the proposed dwellings, access roads, open space, trees and landscaping whilst respecting surrounding character of the settlement and the setting of the nearby listed building. A copy of the masterplan is provided as Appendix 2 to demonstrate how the Council's policy objectives can be delivered on this site. This masterplan has been informed through pre-application discussions with the Council, as well as being shaped through the Design Review Panel process. The layout has also been refined in response to consultation responses during the planning application process.</p> <p>Neighbourhood Plans</p> <p>The submitted planning application has responded to the housing mix policies of the adopted Loggerheads Neighbourhood Plan by providing a broad mix of house types and sizes, including smaller properties, homes suitable for first time buyers and the elderly and affordable housing.</p> <p>Affordable Housing</p> <p>The outline planning application that is currently subject to appeal provides for 30% affordable housing in accordance with the council's emerging affordable housing policy which requires 30% affordable housing on greenfield sites.</p> <p>Housing Mix and Density</p> <p>As set out above under Neighbourhood Plans, the site will deliver a broad mix of houstypes and these will be provided in a mix of densities to reflect the characteristics, opportunities and constraints of the site.</p> <p>Design</p> <p>The submitted masterplan has been informed by an extensive contextual analysis and a full design review. The masterplan demonstrates that a high quality design and layout can be delivered on the site, along with landscape infrastructure and sustainable drainage. Shropshire Homes are experienced developers and deliver high quality houstypes. Shropshire Homes are currently delivering another site adjacent to the Community Fire Station in Loggerheads which demonstrates the high quality housing product that Shropshire Homes can deliver.</p> <p>Historic Environment</p> <p>It is accepted that the proposal would result in some visual change within the setting of White House Farm which is a Grade II listed building. As set out in the committee report to application reference</p>

23/00002/OUT, the proposal would result in less than substantial harm that would fall at the lower end of the spectrum of less than substantial harm and that this should be weighed against the public benefits of the proposal.

This less than substantial harm would occur through the anticipated visibility of development in views to and from the asset, although it should be noted that a significant area of intervening agricultural land will remain between the asset and the proposed allocation and there will be a green landscaped buffer to the eastern boundary of the site that would provide a transition between built form and the boundary to the adjoining field parcel.

The Heritage Impact Assessment (HIA) forms part of the Council's Local Plan evidence base. The HIA provides an assessment proforma of LW53.

With regard to the significance and setting of known heritage assets, the HIA concludes, with regard to the contribution that the site makes to the significance of White House Farm, that:

The closest designated heritage assets to the site are a mid-to-late 19th century milestone (1205706) on Eccleshall Road, c 230m west of the site, and White House Farmhouse (1377586), c 240m east of the site. Despite its proximity, there is no intervisibility between the milestone (1205706) on Eccleshall Road and the site, however, there is partial intervisibility between the White House Farmhouse (1377586) and the majority of the site – the significance of this asset is derived, in part, from its imposing and prominent position within the existing landscape but also as a defining feature within a previous post-medieval agricultural landscape. Despite its continued agricultural use there are no 'positive' remains of previous medieval/postmedieval features indicative of this activity within the site, and the extent to which belowground elements of these features survive is unknown. As such, the site makes a neutral contribution to the setting/significance of known heritage assets within the study area. (emphasis added).

With regard to an overall impact assessment, the HIA acknowledges that the development of the site could impact upon on heritage assets within the environs of the site and makes recommendations for minimising harm and maximising enhancement. These recommendations include:

(a) Where possible existing hedgerows and trees should be retained to help to preserve the pattern of enclosure within the site.

(b) Additional areas of screening/planting should be considered at the eastern extent of the site, to reduce harm to White House Farmhouse.

(c) Development within the site should attempt to preserve long range views of the farmhouse, particularly those along the key approaches into the village from the north (Rock Lane), and west (Eccleshall Road) of the site. This would help to maintain the site's existing neutral contribution to the setting/significance of this asset.

The submitted masterplan demonstrates that in accordance with the emerging policy, that the layout and design of the development can respond sensitively to the significance of the nearby heritage asset (Whitehouse Farm).

#### Social and Community Facilities

The supporting masterplan demonstrates that the development of the site can provide on site open space, including linear green walking routes around the site perimeter, informal areas of open space, tree planting and a local area of play.

In addition, the development can provide financial contributions towards a MUGA and additional facilities on Neighbourhood Plan allocations LV1 and LV2. Such contributions are being provided as part of the appeal proposal and would be secured by way of a Section 106 Agreement.

With regard to education, Loggerheads contains a primary school. In addition, the site also falls within the catchment of St Mary's School, Mucklestone. Both schools currently have surplus capacity to accommodate additional primary age pupils as demonstrated by the school capacity and pupil roll data below available from the Department for Education (see attachment)

In response to the planning application proposals for 150 dwellings, Staffordshire County Council as Local Education Authority calculated that 32 primary school places are likely to arise from the proposed development. With 33 places available at St Mary's School in Mucklestone and a further 51 places available at Hugo Meynell School, there is sufficient capacity available to accommodate additional primary school pupils arising from new development in Loggerheads.

With regard to healthcare provision, the Loggerheads is located in close proximity to the village of Ashley where the doctors surgery is located. Ashley Surgery accepts new patient registrations<sup>5</sup>.

Whilst the GP surgery is not located in Loggerheads itself, journeys to Ashley surgery would be relatively short. Financial contributions towards local healthcare provision can be facilitated by the development if deemed to be CIL compliant.

With regard to promoting healthy and active lifestyles, as already stated above, the site can provide expansive areas of open space, play space and walking routes, and walking routes that are surfaced and lit are available to access local services and facilities in Loggerheads.

#### Landscape and Green Infrastructure

As demonstrated through the planning application submission, the greatest level of visual change would relate to the site and the very localised area immediately adjacent to the site. The effect on potential receptor groups in the wider landscape context, including users of the wider PRoW network, would be generally very limited.

The existing trees and hedgerows which surround the site would also help to soften the appearance of new built form where this is visible and the mitigation inherent in the design will help to assimilate the proposed development into the landscape in a manner which complements the character of the existing adjacent areas of the settlement (i.e. a strong framework of green infrastructure set across the upper slopes and topographical high ground).

Overall, the context provided by the existing settlement edge of Loggerheads and the combined screening effects of topography, existing vegetation and built form means that effects on landscape character and local visual amenity would be very limited in scale.

The submitted masterplan otherwise demonstrates how the development can be successfully incorporated into the landscape.

With regard to blue infrastructure, SUDS measures, including swales and an attenuation basis, to reduce surface water run off and also provide habitat.

Biodiversity and Geodiversity

There are no ecological constraints to developing the site, subject to appropriate avoidance and mitigation measures where required.

The submitted biodiversity metric provided with the planning application demonstrates that 10% biodiversity net gain can be achieved on the site.

#### Highways

A suitable access with appropriate visibility splays can be provided directly onto Muckleston Wood Lane. In addition, a bus set down facility can be provided on the edge of the site curtilage for secondary school pupils using the secondary school bus service.

In addition to the above, off site highway improvement works can be undertaken along Muckleston Wood Lane as per those submitted to the Council and endorsed by the Local Highway Authority as part of application reference 23/0002/OUT which include a series of kerb build outs and refuges to both control vehicle speeds as well as provide refuges for pedestrians to step off the road to avoid any oncoming traffic.

Sufficient levels of parking can be provided within the development, including the provision of electric vehicle charging infrastructure to each of the proposed dwellings.

#### Environmental Health

In terms of site specific opportunities and constraints, there are no barriers to the development of the site land contamination and air quality perspective and construction related activities can be controlled by way of a construction and environmental management plan.

#### Flood Risk

As referred to earlier, the supporting masterplan for the site demonstrates that surface water attenuation can be provided on site in the form of ponds and swales. The design of these measures have been informed by a flood risk assessment and drainage strategy that was submitted with application reference 23/0002/OUT and agreed in principle by the Lead Local Flood Authority (Staffordshire County Council).

#### Utilities

Suitable utility provision is available within the surrounding area, and no objections were raised on the grounds of insufficient infrastructure capacity by statutory undertakers in response to application reference 23/0002/OUT.

#### Infrastructure

The site can make the necessary contributions towards local infrastructure provision in line with Policy IN1.

#### Minerals

A Mineral Resource Assessment was submitted with application reference 23/00002/OUT which demonstrates that some of the mineral resource on site can be used as part of the programme of construction works. The County Council as the Mineral Planning Authority raised no objections to the final proposals for 150 dwellings on this site.

In light of the conclusions above, it has been demonstrated the development of 150 dwellings on this site would satisfy criteria 1 of Policy LW53.

#### Criteria 2 – Access onto Muckleston Wood Lane

As set out in response to highways and access under criteria 1 above, direct access with appropriate visibility splays can be provided onto Muckleston Wood Lane.

#### Criteria 3 – Submission of a Heritage Impact Assessment

A heritage impact assessment was submitted with application reference 23/00002/OUT.

The proposal would result in some visual change to the setting of the nearby listed building (White House Farm), and the Council agree that this would result in less than substantial harm, albeit at the lower end of the spectrum of less than substantial harm. This harm can be further mitigated through the provision of an appropriate landscape scheme to the eastern boundary of the site.

#### Criteria 4 - Archaeological Recording

The planning application did not include the submission of an archaeological survey. It is unclear what evidence there is to demonstrate whether or not there is likely to be archaeological remains on the site and it may be that this criteria has been included in the policy in error. In addition, no conditions were proposed to be imposed with regard to archaeology in the officer report to committee. It is therefore requested that this criteria be removed from the policy.

#### Criteria 5 – Landscape Buffer to the East of the Site

As discussed under other criteria, the submitted masterplan demonstrates the provision of a landscape buffer to the east of the site and that this can be achieved in a suitable manner.

#### Criteria 6 – Green Buffer to the West of the Site

As discussed under other criteria, the submitted masterplan demonstrates the provision of a green buffer to the west of the site. This includes the retention of existing trees and the enhancement of this buffer through further planting.

#### Criteria 7 and 8 – Land Contamination and Noise Impact Assessment

Both of these assessments were submitted with the planning application to demonstrate that land contamination and noise is not a constraint to development, and that any noise impacts from surrounding uses can be mitigated where necessary.

#### Criteria 9 – Mitigation Strategy - SPZ3 Groundwater Protection Zone

The development does not interrupt the SPZ3 Bearstone Groundwater Aquifer, however extensive testing of the aquifer will accompany any planning application in order to ensure that the development does not affect the aquifer.

#### Criteria 10, 11 and 12 – Financial Contributions

These criteria require contributions towards education, healthcare provision, open space, community facilities and highway contributions.

As set out under Criteria 1 of the policy earlier in this submission, the proposal can make all of the relevant contributions towards local services and infrastructure as required and as demonstrated through the submitted planning application.

#### Other Considerations - Suitability of Loggerheads for Additional Housing Development

Loggerheads is identified as a Rural Centre in the DLP. This status in the DLP settlement hierarchy is underpinned by the Rural Area Topic Paper that forms part of the Council's evidence base.

	<p>The topic paper demonstrates that Loggerheads currently benefits from the following services and facilities:</p> <ul style="list-style-type: none"> <li>(a) Co-operative foodstore</li> <li>(b) Post Office</li> <li>(c) Primary school</li> <li>(d) Library</li> <li>(e) Hairdressers</li> <li>(f) Restaurant</li> <li>(g) Public house</li> <li>(h) Places of worship</li> <li>(i) Butchers</li> <li>(j) Community meeting room at the Fire Station</li> <li>(k) Pharmacy</li> <li>(l) Bus service between Market Drayton and Newcastle-under-Lyme (service number 64)</li> <li>(m) Veterinary clinic</li> </ul> <p>In addition, Loggerheads is located in close proximity to the settlements of Mucklestone and Ashley, both of which fall within the Loggerheads Parish. Ashley contains a GP surgery and a restaurant and a village hall is located outside of the village boundary between Ashley and Loggerheads. Mucklestone also contains a primary school, with parts of Loggerheads falling within the catchment area for this primary school, including proposed site allocation LW53.</p> <p>The three villages therefore provide a range of services where services in one village may support the residents of another village. In particular, residents of Ashley and Mucklestone will rely on the Post Office and Co-Operative foodstore, and residents of Loggerheads will rely on the GP surgery in Ashley. Rural Centres are identified as providing “a significant role in service provision to the local population and must contain a number of essential services and facilities in order to meet the day to day needs of residents”.</p> <p>The above demonstrates that Loggerheads is a sustainable location that is a suitable location for some additional residential development in planning policy terms, and that has been the consistent finding of both planning officers in determining planning applications, and planning inspectors at appeal. Further to the above, allowing some additional development around the larger rural centres would provide additional critical mass to provide additional residents to support existing services and facilities and provide some additional patronage to existing bus services so that such services continue to be viable. As such, there is no doubt that Loggerheads is a suitable and sustainable location for some additional residential development and the proposed allocation of LW53 at Loggerheads is considered to be sound, supported by a robust evidence base and is therefore justified.</p> <p><b>DELIVERABILITY</b></p> <p>This site is being promoted by Shropshire Homes who are committed to the delivery of this site for housing as demonstrated through the submission of the planning and application and the lodging of a subsequent appeal.</p> <p>In terms of delivery, it is anticipated that the development of the site will follow the following broad timescales in the event that the planning appeal is allowed, with dwellings being delivered at a rate of around 25 – 35 homes per annum:</p> <ul style="list-style-type: none"> <li>(a) Appeal decision expected February 2025</li> <li>(b) Submission of applications for reserved matters and discharge conditions – second or third quarter of 2025</li> <li>(c) Site preparation works and construction of initial site access – fourth quarter of 2025</li> <li>(d) First phase of homes delivered on site – first half of 2026</li> <li>(e) Completion of the development – circa 2029</li> </ul> <p>The site would therefore be deliverable within the plan period and within the first 5 years of adoption.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Shropshire Homes for allocation reference LW53
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Shropshire Homes for allocation reference LW53
<b>Attachments</b>	<a href="#">1342325 Shropshire Homes LW53.pdf</a> <a href="#">1342325 Shropshire Homes Appendix 2 - LW53 - Masterplan.pdf</a> <a href="#">1342325 Appendix 1 - Counsel Opinion - NPPF Transition.pdf</a>
<b>Comment ID</b>	NULLP918
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Shropshire Homes
<b>Consultee Family Name</b>	Shropshire Homes
<b>Agent Company / Organisation</b>	Knights
<b>Agent Family Name</b>	Corinaldi-Knott
<b>Agent Given Name</b>	Alan
<b>Q4 Part of document</b>	Policy



<b>Q4 Policy</b>	Site Allocations (omission)
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Please see supporting representation by Knights on behalf of Shropshire Homes for an omission site adjacent to allocation reference LW53.</p> <p><b>ALLOCATIONS</b></p> <p>Shropshire Homes has an interest in this site on the edge of Loggerheads on Mucklestone Wood Lane, as well as the adjoining site to the west which is proposed for allocation (LW53). As per our separate representation the proposed LW53 allocation in the Regulation 19 Local Plan is supported and the inclusion of this omission site would complement that.</p> <p>In addition to the above allocation, this representation puts forward the allocation of an additional field parcel to the east of proposed site allocation reference LW53 for in the region of 50 dwellings.</p> <p>The Inspector conducting the examination is invited to allocate this additional land on the basis of the following:</p> <ul style="list-style-type: none"> <li>(a) that in the event that the Inspector considers that the allocation of additional land for development will make the plan sound in order to ensure that the emerging housing requirement is met in full;</li> <li>(b) That the site is located adjacent to a proposed allocation in the Regulation 19 LP;</li> <li>(c) that the site is being promoted by a housebuilder involved in the promotion of the adjoining allocation, which would ensure that the site could be delivered quickly and in the earlier part of the plan period to ensure that a 5 year housing land supply can be achieved upon the adoption of the plan;</li> <li>(d) that the site is located in a sustainable location that would enhance the provision of additional affordable housing in a more rural location;</li> <li>(e) that the provision of additional development in this location would enhance the support and sustainability of existing services and facilities in the village that would make the village more sustainable in the long term;</li> <li>(f) that the development would be able to contribute to the provision of additional community facilities on Neighbourhood Plan sites LV1 and LV2 which are allocated for community uses.</li> </ul> <p>With regard to the specific requirements of the site, it is considered that the site can deliver against, and comply with the requirements set out at both Policy SA1 and the requirements set out under Policy LW53 for the adjoining allocation.</p> <p><b>Policy SA1</b></p> <p>With regard to criteria SA1, a number of criteria need to be satisfied, and the commentary below will explore how relevant criteria can be addressed. A number of submissions in relation to SA1 are similar for this site as they are for LW53, so in the interest of brevity, the proposed allocation of additional land can deliver upon all of the criteria that can be delivered on site allocation LW53, so this representation will deal with the masterplanning, heritage and landscape matters that will be relevant to the consideration of this additional parcel of land.</p> <p><b>Master Plans</b></p> <p>A masterplan has already been provided to the Development Management section of the Council as part of application reference 23/00002/OUT (prior to the reduction in scale of the application to 150 dwellings within the LW53 allocation), with the masterplan setting out how the site can deliver the proposed dwellings, access roads, open space, trees and landscaping in tandem with LW53 whilst respecting surrounding character of the settlement and the setting of the nearby listed building. A copy of the masterplan is provided as Appendix 2 to demonstrate how the Council's policy objectives can be delivered on this site. This masterplan was informed through pre-application discussions with the Council, as well as being shaped through the Design Review Panel process. The additional land can otherwise be delivered in a comprehensive and cohesive manner with LW53. It should be noted that the access shown on the attached masterplan has since been superseded and the access into the omission site would be taken through allocation reference LW53 via the access as shown on the masterplan that is submitted with the representation supporting that allocation.</p> <p><b>Historic Environment</b></p> <p>It is accepted that the proposal would result in some visual change within the setting of White House Farm which is a Grade II listed building. As with LW53, it is accepted that the development of this additional parcel of land would result in less than substantial harm. A heritage briefing note by Pegasus (Appendix 3) suggests such harm that would fall at the lower-moderate end of the spectrum of less than substantial harm and that this should be weighed against the public benefits of the proposal.</p> <p>This less than substantial harm would occur through the anticipated visibility of development in views to and from the asset, although it should be noted that a significant area of intervening agricultural land will remain between the asset and the proposed allocation and there will be a green landscaped buffer to the eastern boundary of the site that would provide a transition between built form and the boundary to the adjoining field parcel.</p> <p>With regard to the significance and setting of known heritage assets, the Council's HIA concludes for LW53, with regard to the contribution that the site makes to the significance of White House Farm, that: The closest designated heritage assets to the site are a mid-to-late 19th century milestone (1205706) on Eccleshall Road, c 230m west of the site, and White House Farmhouse (1377586), c 240m east of the site. Despite its proximity, there is no intervisibility between the milestone (1205706) on Eccleshall Road and the site, however, there is partial intervisibility between the White House Farmhouse (1377586) and the majority of the site – the significance of this asset is derived, in part, from its imposing and prominent position within the existing landscape but also as a defining feature within a previous post-medieval agricultural landscape. Despite its continued agricultural use there are no 'positive' remains of previous medieval/postmedieval features indicative of this activity within the site, and the extent to which belowground elements of these features survive is unknown. As such, the site makes a neutral contribution to the setting/significance of known heritage assets within the study area. (emphasis added).</p>



It is considered that the above conclusions also apply to the additional field parcel, and whilst this would bring development closer to the listed building, there would still be a significant gap between the proposed development and the listed building, and that any less than substantial harm can be mitigated through appropriate landscaping of the eastern site boundary, along with the design and layout of the development, which can include street design and layout, open space provision, tree planting, and the use of smaller house types such as single storey dwellings to the east of the site to create a tapering off of the development, rather than a hard edge.

With regard to an overall impact assessment, the HIA acknowledges that development could impact upon heritage assets within the environs of the site and makes recommendations for minimising harm and maximising enhancement. These recommendations include:

- (a) Where possible existing hedgerows and trees should be retained to help to preserve the pattern of enclosure within the site.
- (b) Additional areas of screening/planting should be considered at the eastern extent of the site, to reduce harm to White House Farmhouse.
- (c) Development within the site should attempt to preserve long range views of the farmhouse, particularly those along the key approaches into the village from the north (Rock Lane), and west (Eccleshall Road) of the site. This would help to maintain the site's existing neutral contribution to the setting/significance of this asset.

The submitted masterplan demonstrates that in accordance with the emerging policy, that the layout and design of the additional parcel of land can respond sensitively to the significance of the nearby heritage asset (Whitehouse Farm). This was the position of the applicant at the time that the planning application for 200 dwellings was first submitted to the Council prior to the reduction in scale of the scheme at the request of officers.

#### Landscape and Green Infrastructure

The potential allocation of this additional land should be considered in combination with allocation reference LW53, and as such, the visual change that would occur through the delivery of around 200 dwellings.

As set out in the submissions for LW53, the greatest level of visual change would relate to the site and the very localised area immediately adjacent to the site. The effect on potential receptor groups in the wider landscape context, including users of the wider PRoW network, would generally be very limited. The existing trees and hedgerows which surround the site would also help to soften the appearance of new built form where this is visible and the mitigation inherent in the design will help to assimilate the proposed development into the landscape in a manner which complements the character of the existing adjacent areas of the settlement (i.e. a strong framework of green infrastructure set across the upper slopes and topographical high ground).

Overall, the context provided by the existing settlement edge of Loggerheads and the combined screening effects of topography, existing vegetation and built form means that effects on landscape character and local visual amenity would be very limited in scale. In order to support this assessment, a briefing note on landscape and visual matters by Pegasus accompanies this submission and is provided at Appendix 4. The briefing note by Pegasus makes the following conclusions:

Overall, the proposed development of up to 200 dwellings across a site that includes the two agricultural fields north of Mucklestone Wood Lane would result in limited effects on landscape character and visual amenity, restricted to the site and its immediate environs, and experienced in the context of the existing settlement edge of Loggerheads.

A range of landscape and visual receptors have been assessed by the detailed LVIA that accompanied the original application for 200 dwellings under application reference 23/0002/OUT (which was subsequently amended and reduced to 150 dwellings at the request of officers), and the impacts subsequently identified for both landscape character and for visual receptors. This has been undertaken as part of an iterative process whereby potential impacts have informed the design of the proposed development and the associated landscape strategy. Mitigation has, therefore, become integral to the proposed development.

The residual impacts identified through this process highlight that the greatest level of effect would relate to the site and to a very localised area immediately adjacent to the site.

The effect on potential receptor groups in the wider landscape context, including users of the wider PRoW network, would be generally very limited.

The existing trees and hedgerows which surround much of the site would also help to soften the appearance of new built form where this is visible and the mitigation inherent in the design will help to assimilate the proposed development into the landscape in a manner which complements the character of the existing adjacent areas of the settlement (i.e. a strong framework of green infrastructure set across the upper slopes and topographical high ground).

Overall, the context provided by the existing settlement edge of Loggerheads and the combined screening effects of topography, existing vegetation and built form means that effects on landscape character and local visual amenity would be very limited in scale.

Consequently, subject to mitigation, in themselves, the landscape and visual matters related to this part of the landscape would not preclude the additional field to the east of the site boundary of the current emerging allocation being included in the final allocation as part of the Local Plan.

The submitted masterplan otherwise demonstrates how the development can be successfully incorporated into the landscape and the allocation of the additional land is therefore considered to be acceptable in design terms.

#### Highways

A suitable access with appropriate visibility splays can be provided directly onto Mucklestone Wood Lane as part of allocation reference LW53 as shown on the masterplan that accompanies the representation by Shropshire Homes for LW53. The access shown on the masterplan that accompanies this submission for the omission site has been superseded and the masterplan provided is for illustrative purposes to demonstrate how the remainder of the site can be laid out to assimilate into the surroundings. This additional land would be accessed through LW53 and would not require the provision of an additional vehicular access. An emergency access can be provided onto this additional land from Mucklestone

	<p>Wood Lane as required. In addition, a bus set down facility can be provided on the edge of the site curtilage for secondary school pupils using the secondary school bus service.</p> <p>In addition to the above, off site highway improvement works can be undertaken along Muckleston Wood Lane as per those submitted to the Council and endorsed by the Local Highway Authority as part of application reference 23/0002/OUT which include a series of kerb build outs and refuges to both control vehicle speeds as well as provide refuges for pedestrians to step off the road to avoid any oncoming traffic.</p> <p>Sufficient levels of parking can be provided within the development, including the provision of electric vehicle charging infrastructure to each of the proposed dwellings.</p> <p><b>Criteria 3 – Submission of a Heritage Impact Assessment</b></p> <p>A heritage impact assessment was submitted with application reference 23/00002/OUT.</p> <p>The proposal would result in some visual change to the setting of the nearby listed building (White House Farm), and this would result in less than substantial harm, albeit at the lower end of the spectrum of less than substantial harm. This harm can be further mitigated through the provision of an appropriate landscape scheme to the eastern boundary of the site as discussed earlier in this submission, in addition to the use of single storey dwellings to the east of the site to taper off the development to the east and avoid the creation of a hard edge to development.</p> <p><b>Criteria 5 – Landscape Buffer to the East of the Site</b></p> <p>As discussed under other criteria, the submitted masterplan demonstrates the provision of a landscape buffer to the east of the site and that this can be achieved in a suitable manner which would help to preserve the setting of the nearby listed building, in addition to the provision of single storey houstypes.</p> <p><b>Other Considerations - Suitability of Loggerheads for Additional Housing Development</b></p> <p>Loggerheads is identified as a Rural Centre in the DLP. This status in the DLP settlement hierarchy is underpinned by the Rural Area Topic Paper that forms part of the Council's evidence base.</p> <p>The topic paper demonstrates that Loggerheads currently benefits from the following services and facilities:</p> <ul style="list-style-type: none"> <li>(a) Co-operative foodstore</li> <li>(b) Post Office</li> <li>(c) Primary school</li> <li>(d) Library</li> <li>(e) Hairdressers</li> <li>(f) Restaurant</li> <li>(g) Public house</li> <li>(h) Places of worship</li> <li>(i) Butchers</li> <li>(j) Community meeting room at the Fire Station</li> <li>(k) Pharmacy</li> <li>(l) Bus service between Market Drayton and Newcastle-under-Lyme (service number 64)</li> <li>(m) Veterinary clinic</li> </ul> <p>In addition, Loggerheads is located in close proximity to the settlements of Muckleston and Ashley, both of which fall within the Loggerheads Parish. Ashley contains a GP surgery and a restaurant and a village hall is located outside of the village boundary between Ashley and Loggerheads. Muckleston also contains a primary school, with parts of Loggerheads falling within the catchment area for this primary school, including proposed site allocation LW53.</p> <p>The three villages therefore provide a range of services where services in one village may support the residents of another village. In particular, residents of Ashley and Muckleston will rely on the Post Office and Co-Operative foodstore, and residents of Loggerheads will rely on the GP surgery in Ashley.</p> <p>Rural Centres are identified as providing "a significant role in service provision to the local population and must contain a number of essential services and facilities in order to meet the day to day needs of residents".</p> <p>The above demonstrates that Loggerheads is a sustainable location that is a suitable location for some additional residential development in planning policy terms, and that has been the consistent finding of both planning officers in determining planning applications, and planning inspectors at appeal.</p> <p>Further to the above, allowing some additional development around the larger rural centres would provide additional critical mass to provide additional residents to support existing services and facilities and provide some additional patronage to existing bus services so that such services continue to be viable.</p> <p>As such, there is no doubt that Loggerheads is a suitable and sustainable location for some additional residential development and the proposed allocation of LW53 and the additional parcel of land to the east to deliver a combined total of 200 dwellings is considered to be sound, supported by a robust evidence base and is therefore justified.</p> <p>This site is being promoted by Shropshire Homes who are committed to the delivery of this site for housing as a second phase of development to LW53.</p> <p>In terms of delivery, it is anticipated that the development of the site will follow as a second phase to LW53, with dwellings being delivered at a rate of around 25 – 35 homes per annum:</p> <p>The site would therefore be deliverable within the plan period and would be able to start delivering homes within the first 5 years of adoption.</p>
<b>Q7 Modification</b>	Please see supporting representation by Knights on behalf of Shropshire Homes for an omission site adjacent to allocation reference LW53
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see supporting representation by Knights on behalf of Shropshire Homes for an omission site adjacent to allocation reference LW53
<b>Attachments</b>	<a href="#">1342325 Omission Site - Muckleston Wood Lane, Loggerheads.pdf</a> <a href="#">1342325 Shropshire Homes Omission Muckleston Wood Lane Appendices.pdf (1)</a>

<b>Comment ID</b>	NULLP47
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Silvester
<b>Consultee Given Name</b>	Gillian
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Dear councillors, we wish to strongly object to proposals contained in the draft local plan to build new houses on prime agricultural land at Mucklestone. It is strange that these plans have been retained on the plan when Newcastle's own planning committee threw them out.</p> <p>There are many reasons why the plan for housing should be abandoned. The local protest committee has already sent you a very detailed response so we will not restate all their points.</p> <p>It seems to us that the site is not the right location because there is no appropriate infrastructure locally to support the development. Public transport is very limited. Residents would need to travel everywhere by private car. The council's planning committee agreed that this was an important consideration.</p> <p>The council's own document "Rural Area Topic Paper " says this : "GP access is dependent on travel to Ashley and there is no direct bus service to the hospital; Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme). Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The site is on prime agricultural farmland and is clearly a greenfield location. It is close to a Grade 11 listed building.</p> <p>The village of Loggerheads has already seen upwards of 1,000 new houses in recent years. It would be an act of vandalism to add to this list. Local people now have to put up with a vast increase in traffic which gives rise to major pollution from both noise and exhaust fumes. Loggerheads is a village. Not a town. We do not wish these problems to be spread along Mucklestone Wood Lane to the picturesque village of Mucklestone,</p> <p>We note that since this housing plan was rejected by your planning committee the number of proposed houses has risen to 450. Where has this number come from? It is a disturbing revelation. Who came up with this number? It does not sound arbitrary. But it is suspicious.</p> <p>The people of Loggerheads and Mucklestone have had to accept that nearly 1,000 new houses have already been built against most of their wishes. Isn't that sufficient? Don't you think we have fulfilled our random quota? Perhaps it just happens that we live in a place you find convenient for your local plan. A place where you can dump lots of houses because it's the easy way to solve a problem. People who live here do not want hundreds more cars and a sudden inability to get a doctor's appointment.</p>

<b>Comment ID</b>	NULLP29
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Simkin
<b>Consultee Given Name</b>	Stella
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1 LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ul style="list-style-type: none"> <li>- The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <ol style="list-style-type: none"> <li>1 (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. <ol style="list-style-type: none"> <li>1 LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</li> <li>2 The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</li> <li>3 Policy PSD3: Distribution of Development (page 16) <ol style="list-style-type: none"> <li>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</li> <li>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</li> </ol> </li> </ol> </li> </ol> </li> </ol> <p>1 Conclusion</p>

	<p>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council’s Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council’s Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP30
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Simkin
<b>Consultee Given Name</b>	Stella
<b>Q4 Part of document</b>	Paragraph
<b>Q6 Details</b>	<p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely “Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads”. This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 (“the NPPF 2023”).</p> <p>I also challenge the soundness of the draft local plan with regard to “Policy PSD3: Distribution of Development” (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1 LW53 is not a “sustainable location” for future housing development and is therefore contrary to national policy. This view was endorsed by the Council’s Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ul style="list-style-type: none"> <li>- The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> </ul> <p>The Council has already determined that this site is not within a sustainable location; consequently, and for the above reasons, the inclusion of this site for housing development contravenes the NPPF 2023.</p> <p>In addition, the Council’s own evidence document namely, the “Rural Area Topic Paper “(June 2021 topic paper-paragraph 124) notes that Loggerheads the following:</p> <p>“Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities”.</p> <p>The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <ol style="list-style-type: none"> <li>1 (i) LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council’s Planning Committee and was one of the reasons for the refusal of housing on this site.</li> <li>2.(ii) The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. <ol style="list-style-type: none"> <li>1 LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council’s Planning Committee as part of the reasoning for the refusal of housing on this site.</li> <li>2 The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council’s Planning Committee as part of the reasoning for the refusal of housing on this site.</li> </ol> </li> </ol> <ol style="list-style-type: none"> <li>1 Policy PSD3: Distribution of Development (page 16) <ol style="list-style-type: none"> <li>(i) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council’s own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</li> <li>(ii) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan).</li> </ol> </li> </ol> </li></ol>

	<p>Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided. Planning Policy Officers merely say that “the Borough has a need for x amount of housing and Loggerheads has to have its share”. Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>1 Conclusion</p> <p>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>6(i) In order for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>6(ii) The reference to the increase of 450 dwellings should be removed from the draft plan</p>



<b>Comment ID</b>	NULLP569
<b>Order</b>	211
<b>Title</b>	Site G&T 8 Land West of Silverdale Business Park
<b>Consultee Family Name</b>	Simpson
<b>Consultee Given Name</b>	Jane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	G&T 8
<b>Q6 Details</b>	<p>My husband and I acquired an allotment around 4 years ago As a mental health nurse working in the NHS for many years I needed a safe space to run to and this allotment was mine My husband can because very physically unwell at times and I have always felt safe going to the allotment on my own But since these plans have been put forward this has changed I feel that the allotment's will be accessible to all and will become a haven for tipping rubbish Also if there is to be a site for 5 caravans who will be policing this having spent time with the traveling community they would not leave families on their own Please rethink this plan I totally disagree with the proposal.</p>

<b>Comment ID</b>	NULLP410
<b>Order</b>	48
<b>Title</b>	Policy HOU4: Gypsy, Travellers and Travelling Showpeople
<b>Consultee Family Name</b>	Sims
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>This part of the Local Plan fails to comply with the duty to co-operate because the Acre Allotment Association became aware of these plans only two days before the Special Meeting on 11th July. At the time, incorrect information was provided to the Acre Allotment Association, in they were initially told the entire allotment site was to go, and during the recent consultation meeting on 16th September, I was advised that either changes had been made to the plans or incorrect information had once more being provided. Therefore this part of the Local Plan fails in its duty to co-operate as incorrect information has been provided, and at the latest possible date. Attending the Consultation meeting, the Council representatives could not answer a single question that I asked, and some could be seen smirking and laughing to each other at some of the attendees. This, and the lack of confirmed information did not fill me with confidence that local communities were going to be treated with respect or consideration.</p> <p>I think this part of the Local Plan is unsound because it does not address the effects of this plan on the current allotment site and surrounding area.</p> <p>The approach to the site is unsuitable for cars towing caravans, the roads approaching the site are too congested already and would be hazardous, particularly with the respect to the school along the route. Additional traffic, especially large vans and caravans will reduce visibility to a dangerous level. The access road from the road to the proposed site is also unsuitable, it is narrow and winding, with only sufficient room for a car. Widening or straightening the approach road would have a seriously detrimental effect on the surrounding area as it would entail the devastation of a long standing area of natural beauty, and long established trees and hedgerows. The same can be said for any inroads into the natural environment there which is a haven for birds, foxes, badgers and other wildlife.</p> <p>I have attached the Google View of the site access, showing the 90 degree turns, and the winding nature of the access road.</p> <p>The security of the site will be severely compromised because at the moment only plot holders are able to access the site by vehicle due to the locking system. This provides security for the site and the plots. I have been unable to obtain any information about how the Council plan to manage this. I currently leave my car on the car park along with other allotment holders, how safe will they be when there is no onsite security? How does the Council plan to maintain the security of the plots? Currently, they can only be accessed by foot, so if someone did manage to get into a plot, they can only remove what they can carry, however, if there is no security at the gate, cars/vans will be able to access the site and remove vast amounts of tools and or produce from peoples allotments.</p> <p>If there is to be changes made to the access route, what will be put in place to ensure the safety and security of plot holders in the meantime.</p> <p>The personal security of people onsite will be severely compromised. Currently, plots are usually locked by padlocks when the plot holder is absent. It is not possible to lock oneself into an allotment for safety reasons, however at the moment there are only plot holders accessing the site. What check will there be on the caravan site occupiers or their visitors? Will the Council be providing CCTV around the site to ensure that plot holders are safe and that if anything untoward takes place, it will be caught on camera? This is an imposition in itself on the freedom and relaxation of the plot holders, but otherwise there is no method to ensure the security of the plot holders. As a single woman who enjoys the privacy of my own allotment, I think my personal safety is being severely compromised by the Council plans to allow anyone, without checks, to access the allotment site. I would also like to know who will be held responsible if anything untoward does happen to me as I have now highlighted this issue a number of times and had no response.</p> <p>[redacted by admin] How will the Council ensure my safety and security with respect to the dogs owned by the G&amp;T's and any visitors they have.</p> <p>I have asked a number of times regarding the security of the site and no-one can supply an answer. Will the G&amp;T's have free access to the Allotment plots or not. What security will be put in place to ensure that travellers and their visitors are not free to come and go and wander around the allotments at any time of day or night.</p> <p>How will services eg Electricity, water, drains be provided to the site? Where will the access points for the pipework be routed, will it be across the allotment sites? If so, will these services also be shared amongst the allotment holders? If not, how will we be compensated for damage to our sites? There is already water supplied to our plots, will the water supply be affected? Regarding waste collections, what arrangements will be put in place to deal with the often massive amounts of waste that accumulate at G&amp;T sites? Will they be included in the normal waste management collection services, and if so, how will these vehicles access the site as they are too large for the entrance route. If there is too much waste, how will that be dealt with.</p> <p>There is a public right of way running through the proposed site, how will the Council ensure the safety and security of people utilising that pathway?</p>

	<p>I raised all these issues at the Consultation on 11th September and received no answers from a variety of representatives, in fact it was clear that some Council representatives did not take any of our issues seriously at all.</p> <p>There needs to be a meeting with the planners and the local community ASAP where there are Council representatives prepared to discuss this plan, explain the choice in site, and address the concern of the plot holders and supply the correct information.</p> <p>There needs to be agreed, acceptable and effective plans to tackle all the issues raised, eg access from Silverdale to the Allotment entrance, and access from the entrance to the site, and what will be put in place to minimise disruption to the allotment site.</p> <p>There needs to be agreed, acceptable and effective plans to ensure the safety and security of the plot holders themselves, but also their vehicles and plot equipment and produce.</p> <p>There needs to be agreed, acceptable and effective plans to ensure that there is adequate services to the site, that there is not an unacceptable build up of waste from the G&amp;T site, also for removal of waste.</p> <p>There needs to be agreed, acceptable and effective plans to ensure there is adequate security for plot holders , their vehicles, belongings and plots, from visitors to the site, including how visitors will be monitored and tracked, eg CCTV on the G&amp;T site and at the entrance, plus vehicle identification systems.</p> <p>There needs to be agreed, acceptable and effective plans to ensure that excessive dogs are not allowed to live on the site [redacted by admin]</p> <p>The above is the minimum required to comply with the Duty to Cooperate.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	I consider this to be necessary because despite reading the plan and attending the Consultation meeting, it appears that information I was provided with was incorrect, and I would like to be sure that I am in possession of the correct information.
<b>Q10 File 1</b>	6386433
<b>Attachments</b>	<a href="#">Park Road Allotments Entrance.png</a>
<b>Comment ID</b>	NULLP409
<b>Order</b>	49
<b>Title</b>	Supporting Information
<b>Consultee Family Name</b>	Sims
<b>Consultee Given Name</b>	Julie
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	This particular piece of land was donated to local people to use as allotments by the previous landowner. The Council passed part of the allotment land to the Acre Allotments in 2015, retaining the remainder for Council allotments. The Council have since allowed that portion of land to fall into disrepair which has now enabled them to identify it as land available for other use. This is clearly wrong and can be interpreted as a device to obtain the land for alternative use.
<b>Q7 Modification</b>	The land should be used for what it was intended for and managed by either the Council or the Acres Allotments for the benefit of local people
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1274
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Slaney
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1. <u>LAND</u></p> <p>a) Originally Newcastle-u-Lyme B Council stated they needed 22 hectares of land adjacent to the Jct 16 of the M6 for warehouse/ employment development, which included a Lorry Park and Power Plant. This has now been increased to 80 hectares! The Council have not given any <u>sound</u> justification for this increase.</p> <p>b) N-U-L B Council have not shown any exceptional circumstances for the removal of 22 (or even 80) hectares of land from the Green Belt when there are alternatives available.:-  PARKHOUSE INDUSTRIAL SITE - 3x empty warehouses. Not West Bank vacated site. International Decorative Surfaces premises to be vacated  CHATTERLEY VALLEY SITE - 2x COMPANIES have pulled out of this site. JCB are vacating their warehouse adjacent to this site  RADWAY GREEN - Various empty warehouses.  AREAS- BW2+BW3  AREA TK30 has better road access to A500 and A34</p> <p>N-U-L B. Council have not shown an attempt to use up existing Brown Field sites before using Green Belt land so not a justified use of Green Belt land - Legally compliant?</p> <p>2. <u>JUNCTION 16 - ACCESS + EMERGENCY ACCESS</u></p> <p>a) This junction is inadequate for such a large site with daily traffic jams of a mile without any accidents. This junction of the M6 and the A500 are notorious black spots for the traffic accidents. The government have recently advised that there will be no more available funds for road improvement making an access point here unrealistic and so not a sound proposition.</p> <p>b) The proposition of emergency access in Phase 1 onto Barthomley Road is not sound. This is a single track lane only access by other single track lanes</p> <p>3. <u>Employment</u></p> <p>N-U-L B Councils statement that this site will bring employment to the area is not backed up by any evidence.</p> <p>This numbers stated cannot be proven as they do not know who or what companies will be on this site.</p> <p>This area has only 2% unemployment so there is no justification for such a site to be built. Low paid employment will not come from Audley or Bignall End or Newcastle 5 miles away. It is more likely to attract from Cheshire East. High paid employment can come from anywhere as its sited on the M6</p> <p>4. <u>TRANSPORT / BUS SERVICE TO THE SITE</u></p> <p>N-U-L B Council suggested that a Bus Service would be set up to service the site.</p> <p>A bus service to this site is not deliverable or even sustainable in the long term.</p> <p>The council quoted 10% of the workforce would use it. However the figure is more likely to be 3% due to the fact that there are no other transport connections (nearest station is 5 miles away and local bus service is heavily subsidised and virtually non-existent)</p> <p>A Bus Service would also have to run 24 hours a day to be useful for shift work and this would not be cost effective so is not a viable solution.</p> <p>N-U-L B Council suggested a cycle park. This is not viable. Access routes are single track lanes making this dangerous - especially at night as these lanes are not lit so not viable for night shift workers. The cost would be prohibitive to built cycle lanes as the site is miles from anywhere - except from Audley + Bignall End!</p> <p>5. <u>LORRY PARK</u></p> <p>N-U-L B Council suggested to offset the huge cots of the Lorry Park they would charge workers for the car park. Surely this is unsustainable and not a sound proposition.</p> <p>6. <u>LAND USE + POLLUTION</u></p> <p>a) N-U-L B Council have stated that the land is not used. This is not proven as cattle graze on the majority of this land.</p> <p>I don't believe that the Council have done the <u>required</u> Agricultural Grading of this land. There is no proof that this land should be removed from farming use.</p> <p>b) Biodiversity Net Gain of 10% - NUL B Council have not addressed how this would be achieved when they are removing existing Agricultural Land from the Green Belt for (unnecessary) employment land.</p> <p>c) NUL B Council have made sweeping statements without facts or factual proposals about new footpaths (footpaths exist and are used), enhancement of native trees (a statement which doesn't even make sense!) and woodland (which again already exists).</p> <p>7. <u>POLLUTION</u></p> <p>a) This proposed site will bring 24 hours of noise, light and air pollution to the people of Audley / Bignall End and the natural environment.</p>

N-U-L B Council suggest that the site will be landscaped and invisible but without any structure to how this will be done.

The topography of the area would make it impossible. Audley + Bignall End are built on high land and hills. The AB2 site is on low lying land which can be seen from above by everyone in both of these villages.

b) The land allocated for AB2 is surely there to protect the villages of Audley & Bignall End from the existing Air, Noise + Light pollution from both the M6 and the A500, which are both only 1 mile away on the North and West sides of the villages.

The removal of this Green Belt Land for the building of warehousing would vastly increase all 3 types of pollution, from the site itself and from the increase in local traffic, to the people of these villages.

Surely this cannot be right!

<b>Comment ID</b>	NULLP191
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Slater
<b>Consultee Given Name</b>	Jan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP232
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Slater
<b>Consultee Given Name</b>	Jan
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP1414
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments: Parking on Liverpool Road, + Bells Hollow is an accident waiting to happen during school drop off and pick up. From the times of 8:15am-9:00am and 2:45-3:30pm the volume of traffic on this small village is ridiculous. People park, or rather dump, their cars all over pavements, double yellow lines and block home-owners driveways. The bus service cannot get through. We have suffered abuse from (quite regularly) parents of the school when asked not to block our drive. To increase the volume of traffic from the proposed development would be madness- this village cannot take anymore traffic!!</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1360
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b> <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>

When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP100
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Proposal: LW53</p> <p>I start my letter by stating firstly that I cannot believe that I am having to compile yet another letter to you with regards to the above. I think you must believe that the residents of Loggerheads will get fed up with doing this yet again and will give up!!!</p> <p>Please see below my many many reasons why I wish to APPEAL, object and complain about the above development going into the Final Draft Local Plan.</p> <p>***Firstly, I would think when the Planning Committee have objected against the above development then this should be enough for you to understand that the development SHOULD NOT go ahead****. Please see underlined in my comments where the Planning Committee have recognised these reasons for refusing the above development.</p> <p>1. LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>2. W53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>3. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:</p> <p>5. I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023"). I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>6. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p> <p>7. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: *****"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.*****</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>Not to mention all of the wildlife, hedgehogs, bats, lap wings, birds, etc that have a habitat along the lane and in the "said" fields. This land is good agricultural land as well as green belt land and SHOULD NOT BE BUILT ON.</p> <p>The traffic along the lane is getting faster, more hazardous and is a much larger volume now than it was and this will only greatly increase. Tractors, lorries, vans etc. People are frequently, walking their babies, children, elderly parents and dogs and there is going to be a major incident shortly, not to mention joining the main A53 at the end of Mucklestone Wood Lane. This is dangerous every day that you pull out and is also a severe accident waiting to happen.</p>



<b>Comment ID</b>	NULLP682
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Ben
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1 Noise:</p> <p>(redacted by admin) the warehouses themselves. Which when operational 24 hours a day will cause a hugely noticeable increase in noise pollution. Further helped by the area being so rural and quiet this will be amplified and cause distress and unwanted disturbance in our everyday lives, especially during evenings and weekends.</p> <p>1 Roads:</p> <p>Audley roads are village roads, already covered in pot holes and cracks. Barthomley Road is a narrow and hedgerow lined road, no suitable for excess traffic which is highly likely as people will use it to cut through or to enter or exit the back gates of the site. Barthomley Road is narrow with very small laybys to accommodate manoeuvres for passing cars both overall is extremely tight and is very much a single lane. It would be highly dangerous and would likely be the source of many accidents and possible injuries to residents (many are elderly), visitors and wildlife which habitat in the hedgerows and accompanying landscapes.</p> <p>There are no street lights and no public footpaths on Barthomley Road which is in the direct route of the proposed plans.</p> <p>1 Traffic:</p> <p>The site would be a cause of huge traffic congestion on the junction 16 roundabout which connects to the A500 and M6. With a potential 3500 employees and many visitors and deliveries to the site at the main entrance, traffic would be highly excessive and isolate many local people of Audley and surrounding areas and prevent the ability to commute and travel is a reasonable timely manor.</p> <p>1 Size of site:</p> <p>The site is too big and imposing to the village of Audley. The proposal is bigger than the village itself!</p> <p>5: Wildlife:</p> <p>The site is greenbelt land which is home to wildlife and nature, which need preserving. It is the reason we relocated and bought our house (redacted by admin) to reside in such a tranquil and peaceful village. Not to be destroyed by industry, commercial developments and unsightly and imposing structures, notice and pollution.</p> <p>6: Existing sites and buildings:</p> <p>There are numerous warehouses and commercial sites already built, stood empty and exist within a few miles of the proposed location. Why destroy green belt land.</p>
<b>Q7 Modification</b>	Stop proposed plans and find an alternative area.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Our house is based just a few hundred yards from an exit onto the site and in close proximity of in Nov 2022, and spent our life savings only two years ago

<b>Comment ID</b>	NULLP1482
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Save Our Green Space
<b>Consultee Position</b>	Coordinator
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>We remain totally opposed to any development on Keele Golf course and those adjoining sites. We would like to submit the following comments in response to the current public consultation exercise.</p> <ol style="list-style-type: none"> <li>1. Whilst appreciating the planning process is primarily a 'technical' exercise for officers and councillors, the latter have a wider responsibility to their electorate where they must reflect the concerns, needs and views of the communities they represent. Any elected person can work to adapt and amend policies to protect local interests.</li> <li>2. Whilst some attempts have now been made to take into account local opinion e.g. the inclusion of a country park in the plans for the old golf course, it is our judgement that the overall plans remain neither effective nor deliverable.</li> <li>3. We have information to the effect that the value of the land of the old golf course, if sold for housing, has already been included in the boroughs budgetary planning going forwards. This presupposes the outcome of the inspection process and does not properly separate the proper function of the LPA from the boroughs ambitions as a landowner. We intend to raise this point at inspection. This conflict of interests raises doubts about the motivation for the proposed housing development. It suggests that the proposals have been developed not in response to the principles of proper planning but rather for budgetary reasons.</li> <li>4. The research into housing need in the area is deeply flawed. This is illustrated by the recent census which shows a population decline, and yet we are proposing to build for a healthily growing population. The council continues to recite the tired mantra of build, and they will come, where is the evidence for this? It might have been thought that the boroughs population would grow in response to the building of HS2 with its terminus in Crewe. This is not now happening; so where will the additional population come from?</li> </ol> <p>It is stated in the plan that the greatest need in our area is for smaller, more affordable homes. The plan proposes that 278 affordable homes will be needed per annum over the lifespan of the plan. Four hundred houses are proposed in total per annum. Thus, seventy percent of our housing need is for affordable homes. The maximum percentage of affordable homes to be delivered in new developments is thirty percent on greenfield sites. We are at a loss to understand how the plan can deliver sufficient affordable homes. This lack of consistency means the document is ineffective and not deliverable and is not in line with national policy. It fails to meet objectively assessed requirements for affordable homes.</p> <ol style="list-style-type: none"> <li>5. Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion.</li> </ol> <p>The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking! The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. Again, the plan is not properly justified, not based on robust and credible evidence nor is it effective. In the unlikely event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible.</p> <p>With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are mere window dressing, in truth, many thousands of extra car journeys will be made every day. Whilst understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart. The utter failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. The proposals are sketchy at best, but if it is proposed that such a road would be open to all traffic, it is highly unlikely that the university would approve its development. This is an illustration of just one aspect of this plan which is not properly justified nor effective nor deliverable.</p> <ol style="list-style-type: none"> <li>6. SOGS welcomes the inclusion of a country park in the plans but are concerned that the plan offers no details of how such a park would be protected for the future were it to be withdrawn from greenbelt. It is our judgement that the park as proposed would be compromised by the need to connect the SP11</li> </ol>

	<p>and SP23 sites to the proposed community hub/school. We are also concerned that any such 'park' may be nothing more than a landbank for further housing development. Especially in light of the proposed access to SP11 (4) and SP11 (3), from residential streets in Silverdale, we do not believe that the plan for the old golf course is effective or deliverable. We judge the risk as high that any eventual development will be of a different pattern and that the country park will not come to fruition. We judge that the borough will put financial gain before the needs of the existing population for health and recreation.</p> <p>The old golf course is heavily used by local people for exercise and recreation, it is the nearest and most accessible informal green space for many of the residents of the town. The needs of existing residents must be paramount in the decision-making processes of the council. Therefore, the council should reverse its proposal to build on the land and should instead make the whole area into a country park within the greenbelt.</p>
<b>Comment ID</b>	NULLP1479
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Save Our Green Space
<b>Consultee Position</b>	Coordinator
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Diane
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>We remain totally opposed to any development on Keele Golf course and those adjoining sites. We would like to submit the following comments in response to the current public consultation exercise.</p> <ol style="list-style-type: none"> <li>1. Whilst appreciating the planning process is primarily a 'technical' exercise for officers and councillors, the latter have a wider responsibility to their electorate where they must reflect the concerns, needs and views of the communities they represent. Any elected person can work to adapt and amend policies to protect local interests.</li> <li>2. Whilst some attempts have now been made to take into account local opinion e.g. the inclusion of a country park in the plans for the old golf course, it is our judgement that the overall plans remain neither effective nor deliverable.</li> <li>3. We have information to the effect that the value of the land of the old golf course, if sold for housing, has already been included in the boroughs budgetary planning going forwards. This presupposes the outcome of the inspection process and does not properly separate the proper function of the LPA from the boroughs ambitions as a landowner. We intend to raise this point at inspection. This conflict of interests raises doubts about the motivation for the proposed housing development. It suggests that the proposals have been developed not in response to the principles of proper planning but rather for budgetary reasons.</li> <li>4. The research into housing need in the area is deeply flawed. This is illustrated by the recent census which shows a population decline, and yet we are proposing to build for a healthily growing population. The council continues to recite the tired mantra of build, and they will come, where is the evidence for this? It might have been thought that the boroughs population would grow in response to the building of HS2 with its terminus in Crewe. This is not now happening; so where will the additional population come from?</li> </ol> <p>It is stated in the plan that the greatest need in our area is for smaller, more affordable homes. The plan proposes that 278 affordable homes will be needed per annum over the lifespan of the plan. Four hundred houses are proposed in total per annum. Thus, seventy percent of our housing need is for affordable homes. The maximum percentage of affordable homes to be delivered in new developments is thirty percent on greenfield sites. We are at a loss to understand how the plan can deliver sufficient affordable homes. This lack of consistency means the document is ineffective and not deliverable and is not in line with national policy. It fails to meet objectively assessed requirements for affordable homes.</p> <ol style="list-style-type: none"> <li>5. Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion.</li> </ol> <p>The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking! The failure of the plan to dignify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. Again, the plan is not properly justified, not based on robust and credible evidence nor is it effective. In the unlikely event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible.</p> <p>With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are mere window dressing, in truth, many thousands of extra car journeys will be made every day. Whilst understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing</p>

development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart. The utter failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. The proposals are sketchy at best, but if it is proposed that such a road would be open to all traffic, it is highly unlikely that the university would approve its development. This is an illustration of just one aspect of this plan which is not properly justified nor effective nor deliverable.

6. SOGS welcomes the inclusion of a country park in the plans but are concerned that the plan offers no details of how such a park would be protected for the future were it to be withdrawn from greenbelt. It is our judgement that the park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school. We are also concerned that any such 'park' may be nothing more than a landbank for further housing development. Especially in light of the proposed access to SP11 (4) and SP11 (3), from residential streets in Silverdale, we do not believe that the plan for the old golf course is effective or deliverable. We judge the risk as high that any eventual development will be of a different pattern and that the country park will not come to fruition. We judge that the borough will put financial gain before the needs of the existing population for health and recreation.

The old golf course is heavily used by local people for exercise and recreation, it is the nearest and most accessible informal green space for many of the residents of the town. The needs of existing residents must be paramount in the decision-making processes of the council. Therefore, the council should reverse its proposal to build on the land and should instead make the whole area into a country park within the greenbelt.

<b>Comment ID</b>	NULLP198
<b>Order</b>	13
<b>Number</b>	3
<b>Title</b>	Context
<b>Consultee Company / Organisation</b>	Canal and Rivers Trust
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Hazel
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	3.9
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Dear Allan Clarke,  Newcastle-under-Lyme Borough Council - Final Draft Local Plan Consultation  Thank you for your consultation on the above document.  We are the charity who look after and bring to life 2000 miles of canals &amp; rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal &amp; River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework. Our waterways are acknowledged within the draft Local Plan, as blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network is an accepted as part of the historic environment, the character, cultural and social focus of the Borough. The Glossary also includes canals within the definition of Blue Infrastructure and defining Canal Towpaths assists with this understanding.  Based on the documents and information available the Trust has the following general advice on the consistency and factual accuracy of the draft local plan as part of its soundness. We request the following minor modifications to the wording of the draft Local Plan to provide greater clarification of the Trusts role within the delivery of the plans aims. We hope that the comments provided are clear and helpful and that your next revision will address these points.  Paragraph 3.9  Paragraph 3.9 currently includes the wording 21 Conservation Areas which cover rural villages, town centres, and parts of the Shropshire Union and Trent and Mersey canals.  We suggest that you use Trent &amp; Mersey with '&amp;' to reduce confusion with the number of 'and' within the sentence and for consistency.</p>
<b>Comment ID</b>	NULLP202
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Canal and Rivers Trust
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Hazel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy SA1: General Requirements  Sustainable Drainage As with policy SE4 we thank you for our inclusion here but ask that our name is corrected for accuracy to Canal &amp; River Trust.  The above comments do not prejudice any further matters that might be raised at a later stage as the plan/document emerges.</p>
<b>Comment ID</b>	NULLP199

<b>Order</b>	83
<b>Title</b>	Policy RET5: Kidsgrove Town Centre
<b>Consultee Company / Organisation</b>	Canal and Rivers Trust
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Hazel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET5
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Policy RET5: Kidsgrove Town Centre Part 1(b) currently worded Enhancement of, and improved access to, the Trent and Mersey Canal. We suggest that you use Trent & Mersey Canal with '&' for consistency.
<b>Comment ID</b>	NULLP200
<b>Order</b>	107
<b>Title</b>	Policy SE4: Sustainable Drainage Systems
<b>Consultee Company / Organisation</b>	Canal and Rivers Trust
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Hazel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE4
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Policy SE4: Sustainable Drainage Systems Part 2(b). Attenuated Discharge to a Surface Water Body: Discharge of rainwater to streams, rivers, lakes, canals (with permission), or other surface water features, ensuring minimal impact on flow rates. Thank you for noting that the canals provide a surface water body disposal option and that the need for our consent is highlighted. However, our name is singular, so we ask that this is corrected for accuracy to Canal & River Trust in: •part 4 of the policy •para 11.21 in the explanatory text.
<b>Comment ID</b>	NULLP201
<b>Order</b>	127
<b>Title</b>	Policy SE14: Green and Blue Infrastructure
<b>Consultee Company / Organisation</b>	Canal and Rivers Trust
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Hazel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE14
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Policy SE14: Green and Blue Infrastructure Thank you for noting that by enhancing canal towpaths proposals will support biodiversity, active travel, and connections between communities and nature. Again, our permission would be needed for enhancements to the network, so for consistency with the approach taken in Policy SE4 we request the following amendments: • part 3(b) .including canal towpaths (with permission), to support.. • para 11.67. The Borough's waterways form a vital part of this blue infrastructure network, including the Trent & Mersey Canal, the Macclesfield Canal, and the Shropshire Union Canal where the Canal & River Trust are owner, operator and navigation authority. Green Infrastructure..



<b>Comment ID</b>	NULLP99
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Joanne
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Proposal: LW53</p> <p>I start my letter by stating firstly that I cannot believe that I am having to compile yet another letter to you with regards to the above. I think you must believe that the residents of Loggerheads will get fed up with doing this yet again and will give up!!!</p> <p>Please see below my many many reasons why I wish to APPEAL, object and complain about the above development going into the Final Draft Local Plan.</p> <p>***Firstly, I would think when the Planning Committee have objected against the above development then this should be enough for you to understand that the development SHOULD NOT go ahead****. Please see underlined in my comments where the Planning Committee have recognised these reasons for refusing the above development.</p> <p>1. LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023). This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>2. W53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023). Again, this harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>3. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). Again, this was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:</p> <p>5. I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023"). I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>6. Conclusion 7(i) In order for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p> <p>7. In addition, the Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes that Loggerheads the following: *****"Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicle due to the lack of poor public transport and access to higher leisure/retail services.*****</p> <p>In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</p> <p>Not to mention all of the wildlife, hedgehogs, bats, lap wings, birds, etc that have a habitat along the lane and in the "said" fields. This land is good agricultural land as well as green belt land and SHOULD NOT BE BUILT ON.</p> <p>The traffic along the lane is getting faster, more hazardous and is a much larger volume now than it was and this will only greatly increase. Tractors, lorries, vans etc. People are frequently, walking their babies, children, elderly parents and dogs and there is going to be a major incident shortly, not to mention joining the main A53 at the end of Mucklestone Wood Lane. This is dangerous every day that you pull out and is also a severe accident waiting to happen.</p>

<b>Comment ID</b>	NULLP844
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>3. Chapter 7: Housing</p> <p>Policy HOU1: Affordable Housing</p> <p>3.1 The policy proposes that for major residential developments of greenfield sites, 30% of all units are to be affordable. The Local Plan Viability Assessment (ED004) indicates that this level of provision is not viable across the majority of sites in Value Area 1. We therefore propose that the policy is amended to reduce the affordable housing rate for greenfield sites in Value Area 1 to 20%. The policy would then reflect the evidence base, in particular Table 8.1 of ED004 which demonstrates that greenfield sites of 60-150 dwellings are at least marginal or viable based on 20% affordable housing.</p>
<b>Q7 Modification</b>	<p>Given that ED004 identifies that the cumulative policy requirements (including affordable housing) are not viable in Value Area 1, we consider that the requirement to provide M4(3) housing should be removed in Value Area 1. However, if the affordable housing requirement in Value Area 1 is reduced as per our suggested amendment to Policy HOU1, then this amendment may not be necessary.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP842
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No

<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy SA1: General Requirements</p> <p>4.2 We generally support Policy SA1 which provides a series of general requirements for the allocated sites. However, we set out a number of proposed modifications to the policy below, with reference to the subheadings in Table 6 of the plan. Master Plans</p> <p>4.3 Whilst the policy does not specify the mechanism for master plans, we would question whether masterplans are needed on all sites. This is particularly important for smaller sites without significant onsite infrastructure requirements (for example our client's site TK27, which is allocated for 90 dwellings). In such cases requiring a masterplan would unnecessarily delay delivery, when it may well be appropriate to move straight to a full application. As a minimum, we consider that Table 6 should be clear that an appropriate mechanism for approving master plans can be through the planning application process.</p> <p>Green Belt Compensatory Measures / Green Belt Boundaries</p> <p>4.4 This section of Table 6 largely reflects the guidance in paragraphs 64-002 and 64-003 of the PPG. However, the plan omits the section at paragraph 64-003 which states that: "Consideration will need to be given to:</p> <ul style="list-style-type: none"> <li>• land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;</li> <li>• the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;"</li> </ul> <p>4.5 The guidance is clear that land ownership and deliverability constraints in relation to compensatory improvements are not intended to prejudice the delivery of allocated sites. We therefore consider that, for the avoidance of doubt, the section in Table 6 should be revised to fully reflect the guidance in the PPG.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP846
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>2. Chapter 5: Planning for Sustainable Development</p> <p>Policy PSD1: Overall Development Strategy</p> <p>2.1 SLG supports the overall development strategy and the proposed increase to the housing requirement from that set out in the First Draft Local Plan.</p> <p>2.2 The current Local Housing Need for Newcastle under Lyme is 330 dwellings per annum (dpa). However, national policy and guidance is clear that local housing need is used to determine the minimum number of homes needed. Paragraph 2a-010 of the NPPG provides the following guidance: "When might it be appropriate to plan for a higher housing need figure than the standard method indicates? The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the</p>

plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

2.3 Paragraph 2a-015 of the Framework provides the following in relation to how such an approach would be tested at examination: "If authorities use a different method how will this be tested at examination? Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point."

2.4 The PPG recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth.

2.5 The relationship between the amount of jobs growth, employment land and housing is summarised in the Warrington Local Plan Inspector's report (October 2023), which states at paragraph 62: "We do not suggest that there needs to be an absolute match between employment land provision, estimated jobs growth and labour supply or that such an absolute match is even possible. However, there needs to be broad alignment, at least, in order for the local economy and housing market to function effectively and to avoid substantial increases in unsustainable commuting patterns."

2.6 The need to provide enough housing to accommodate economic growth was also recognised in the Doncaster Local Plan, where LHN equated to 553 dpa but the plan requirement is 920 dpa. The Inspector's report (June 2021) states at paragraph 56: "The significant uplift is intended to allow additional people to live in the Borough to ensure a sufficient working population to take account of the number of additional jobs that the Plan aims to accommodate."

2.7 Similarly, a higher housing requirement than LHN was adopted in the St Helens Local Plan to align with economic growth aspirations. The Inspector's report (May 2022) states at paragraph 54: "The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand."

2.8 The circumstances in Newcastle under Lyme justify the application of an alternative method to determine local housing need, in accordance with the Framework and paragraph 2a-010 the NPPG. Specifically, the housing need associated with planned and projected employment growth is likely to significantly exceed that set out in the standard method. The PPG recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth.

2.9 The Housing and Economic Development Needs Assessment (2024) (HEDNA, ED001) provides an assessment of local housing and employment needs over the plan period (2020–2040). To support forecast economic growth and associated increase in the working age population, the HEDNA identifies a need to deliver approximately 8,000 dwellings (400 dwellings per annum) over the plan period (2020–2040).

2.10 SLG considers that the HEDNA represents a robust assessment of housing need having regard to economic considerations. It therefore provides an appropriate basis for the proposed housing requirement.

2.11 As the Council will be aware, the Government has consulted upon changes to the Framework including a new method for calculating local housing needs. The outcome of the proposed revised method for Newcastle-under-Lyme is that the local housing need is now 593 dpa. However, at present, the revised standard method can only be given limited weight. Furthermore, the draft changes to the Framework also propose transitional arrangements which mean that:

- Newcastle-under-Lyme can proceed with the Local Plan as currently drafted, provided that the Council moves quickly to submission and examination, as the housing requirement proposed is within 200 dwellings per annum of the revised standard method<sup>2</sup>; and,
- Five year housing land supply (5YHLS) would be measured against the new Local Plan once it is adopted<sup>3</sup>.

2.12 It should also be noted that the progression of the plan, which releases sites now would help to address the local and national housing crisis, is an extremely positive step, particularly in the context of the significant work already undertaken by the Council in preparing the draft Local Plan. Working towards the adoption of an up-to-date Local Plan as soon as possible clearly accords with the Written Ministerial Statement (WMS) of 30 July 2024 (Building the homes we need), and it will ensure that growth is delivered as quickly as possible through the plan-led system. The alternative is that the growth proposed in this plan would not be achieved, and speculative applications would come forward in the absence of an up-to-date plan.

**Q7 Modification**

See attached representations

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP845
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>3. Chapter 7: Housing</p> <p>Policy HOU3: Housing Standards</p> <p>3.2 For major developments, Policy HOU3 seeks that 10% of market dwellings should meet the requirements of Building Regulations Part M4(3)(2)A wheelchair adaptable homes standard and 10% of affordable / social rented housing should meet the requirements of Part M4(3)B accessible homes. Whilst we recognise the need to provide for such housing, this is a very significant cost to development. The Local Plan Viability Assessment (ED004) applies the following costs as an extra-over policy cost in the appraisals:</p> <ul style="list-style-type: none"> <li>• M4(3)(A) Adaptable: £10,500 per house applied to 10% of open market houses.</li> <li>• M4(3)(A) Adaptable: £8,000 per flat applied to 10% of open market flats.</li> <li>• M4(3)(B) Accessible: £23,000 per house applied to 10% of affordable houses.</li> <li>• M4(3)(B) Accessible: £8,000 per flat applied to 10% of affordable flats.</li> </ul>
<b>Q7 Modification</b>	<p>Given that ED004 identifies that the cumulative policy requirements (including affordable housing) are not viable in Value Area 1, we consider that the requirement to provide M4(3) housing should be removed in Value Area 1. However, if the affordable housing requirement in Value Area 1 is reduced as per our suggested amendment to Policy HOU1, then this amendment may not be necessary.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP848
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul

<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>2. Chapter 5: Planning for Sustainable Development</p> <p>Policy PSD3: Distribution of Development</p> <p>2.14 Under Policy PSD3, 5,200 homes are distributed to the strategic centre of Newcastle-under-Lyme, an uplift of 400 dwellings from the previous iteration of the plan (which also appears to correspond with the uplift of 400 dwellings to the housing requirement). In contrast, only 800 new homes are distributed to the urban centre of Kidsgrove, which appears to be too low based on the evidence. This is less development than was proposed in Kidsgrove in the previous Regulation 18 consultation (Draft Plan).</p> <p>2.15 Policy PSD2 also recognises that Kidsgrove benefits from a high number of services and facilities, retail and leisure, economic and residential areas, sustainable transport connections and accessible public open space. Furthermore, Kidsgrove railway station is the only mainline train station in the borough, which also provides direct links to a range of local and national destinations including Manchester and London. The station has been the subject of significant investment for accessibility improvements (£5.5m via Access for All funding), and there are long-term ambitions for the car park to house a bus station to create an integrated public transport hub. The Council's website states4:</p> <p>"Kidsgrove Station represents a key growth opportunity for the town. Crewe is a 15- minute rail journey from Kidsgrove with 34 trains travelling from Crewe to Kidsgrove on an average weekday. The Crewe hub will see 18 trains per hour running to and from London by 2033, and an additional 12 trains per hour to and from Birmingham. This will transform Kidsgrove's rail connectivity and attractiveness as a place to live and invest. The redevelopment of Kidsgrove station has been a long-term priority with widespread local support."</p> <p>2.16 The rail station at Kidsgrove is therefore very important for the borough and represents a key opportunity when considering the distribution of development. In our view, Kidsgrove is highly sustainable and should be accommodating an even greater proportion of the proposed housing requirement.</p>
<b>Q7 Modification</b>	Please see attached representations.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP843
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No



<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>Policy TK27: Land off Coppice Road, Talke</p> <p>5.1 SLG is promoting the land off Coppice Road, Talke as a draft allocation for residential development. We strongly support the allocation in the draft plan.</p> <p>5.2 Details of the site and the proposed allocation were provided in response to the Issues and Options and the First Draft consultations, including a comprehensive Development Prospectus, a copy of which is provided at Appendix EP1 of these representations.</p> <p>5.3 The representations firstly address the principle of allocating the site and the Council's site selection process, before addressing the specific criteria within the allocation policy.</p> <p>Principle of the allocation</p> <p>Exceptional circumstances for Green Belt release</p> <p>5.4 The Council has published a paper entitled: Exceptional circumstances for green belt release (Green Belt Assessment Part 2, ED008b). We agree with the paper's conclusion that exceptional circumstances exist. It is apparent from the evidence base in relation to both housing need and supply that a significant amount of Green Belt release will be needed to meet housing needs. There is also a specific need to release Green Belt around Kidsgrove, to provide an appropriate level of growth within the urban centre in accordance with the spatial strategy. Therefore, there are exceptional circumstances at the strategic level to justify Green Belt release.</p> <p>5.5 At a site-level, paragraph 4.4 of the Green Belt Assessment Part 3 (ED008a) sets out a range of exceptional circumstances for the Council to consider. In relation to Site TK27 the following factors comprise the site level exceptional circumstances:</p> <ul style="list-style-type: none"> <li>• The Site Selection process demonstrates that there are no available sites that make a lesser contribution to the Green Belt purposes.</li> <li>• The impact of removing the site on the overall function and integrity of the wider Green Belt would be limited.</li> <li>• The evidence base and the enclosed Development Prospectus demonstrates that a recognisable and permanent boundary already exists and could be enhanced.</li> <li>• The site is located in an accessible location and is well-served by public transport. A full assessment of accessibility is provided within the enclosed Development Prospectus.</li> <li>• The site would make a valuable contribution to addressing the housing needs of the borough and Kidsgrove.</li> <li>• The site is deliverable in the short term and can contribute to the 5-year housing land supply.</li> </ul> <p>5.6 These factors are discussed in further detail below.</p> <p>Site Selection process</p> <p>5.7 The Site Selection Report (ED029) sets out a 7-stage methodology that the Council has applied in allocating sites. The Site Selection report sets out a logical approach to site selection in Kidsgrove and the approach taken is considered to be robust. The allocation of the site accords with the Council's methodology.</p> <p>5.8 Once it has been established that Green Belt release is required, the key stage in the methodology is 'Stage 7'. This is when the Council selects sites based on a range of evidence, including:</p> <ul style="list-style-type: none"> <li>• Sustainability Appraisal</li> <li>• Habitats Regulations Assessment</li> <li>• Strategic Housing and Employment Land Availability Assessment</li> <li>• Landscape and Settlement Character Assessment work and Landscape work on sites</li> <li>• Strategic Flood Risk Assessment</li> <li>• Green Belt Assessment, parts 1, 2, 3 &amp; 4</li> <li>• Climate Change Adaptation and Mitigation Report</li> <li>• Infrastructure Delivery Plan</li> <li>• Strategic Employment Sites Study</li> <li>• Viability Study</li> <li>• Open Space and Green Infrastructure Strategy</li> <li>• Playing Pitch Strategy</li> <li>• Nature Recovery Mapping Report</li> <li>• Heritage Impact Assessment</li> <li>• Strategic Transport Assessment</li> </ul> <p>5.9 The Council has taken into account a wide range of evidence in selecting the sites. Whilst the final selection of sites will always come down to a matter of planning judgement, the evidence underpinning the site selection process is robust and comprehensive. The plan and the final selection of sites is justified, in that it represents an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>5.10 The selection of allocations in Kidsgrove is discussed in Section 7 of the Site Selection Report. Table 13 identifies the sites that are within 400m of a bus stop and addresses their contribution to the Green Belt purposes. Site TK27 makes a moderate contribution and is considered in Table 15. Green Belt considerations are discussed further below.</p> <p>Green Belt</p> <p>Paragraph 147 of the Framework</p> <p>5.11 A key factor when reviewing Green Belt boundaries is the need to promote sustainable patterns of development. This includes having regard to all requirements of the Framework, including meeting housing and employment land needs. Paragraph 147 of the Framework also states:</p> <p>"Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."</p>

5.12 The site is highly accessible by public transport with four bus services an hour passing the site on weekdays. These services connect the site to the centres of both Hanley and Kidsgrove. The bus services also provide access to Kidsgrove train station, which benefits from direct services to a range of locations including Stoke, Crewe, Manchester Piccadilly and London Euston.

5.13 Therefore, in accordance with paragraph 147 of the Framework, the site is well served by public transport and should be given first consideration for release from the Green Belt.

Green Belt Assessment

5.14 In the Green Belt Assessment Part 1 (ED008c) undertaken by consultants Arup, the site was assessed as part of a larger tract of land to the west of Kidsgrove (parcel 36). It was considered to make a 'moderate contribution' to the Green Belt purposes. This means: "on the whole the parcel contributes to a few of the elements of the Green Belt purpose however does not fulfil all elements".

5.15 The site is assessed individually in the Green Belt Assessment Part 2 (ED008b) (parcel TK27). The assessment concludes as follows: "The site makes a moderate contribution to Green Belt purposes. Development of the site would not represent unrestricted sprawl, it would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Talke. Development would entail a small incursion into undeveloped countryside relative to the size of Talke. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt. A new recognisable and permanent Green Belt boundary would be created consisting of Merelake Road to the south and through strengthening the existing western boundary. It is recommended that if the site is taken forward the accompanying policy should recognise this." (our emphasis)

5.16 The Green Belt Assessment Part 4 (ED008) retains this assessment. Therefore, the conclusions of the Green Belt Assessment are:

- The site does not make a 'significant contribution' to any of the Green Belt purposes.
- The site makes a 'moderate contribution' to the Green Belt purposes overall.
- The release of the site would not harm the overall function and integrity of the Green Belt.
- The site should be considered for release.

5.17 Notwithstanding these conclusions, we consider that the site makes a 'weak contribution' to the Green Belt purposes. Indeed, the Council's Green Belt assessment does not indicate that the site makes anything more than a weak contribution against any of the Green Belt purposes. The site is surrounded on 3 sides by permanent built development in the form of road infrastructure and residential development, and natural screening in the form of hedgerows and trees, as well as the marked change in topography beyond the western boundary, provides defensible boundaries and a strong sense of containment. This could be supplemented through a comprehensive landscaping scheme.

5.18 Importantly, the site is not found to make any perceptible contribution to preventing towns merging into one another, namely Kidsgrove and Alsager or Bignall End, and there would be no physical or perceived closing of the gap between these towns if the site were to be developed. This is in contrast to other possible site options around Kidsgrove, such as those to the south of the settlement (where there are potential issues of merger between Kidsgrove and Newcastle-under-Lyme) and to the north-east of the settlement (where there are potential issues of merger between Kidsgrove and the villages of Harriseahead and Mow Cop).

Creation of a defensible boundary

5.19 As part of our discussions with the Council in 2018, the Council sought additional analysis of the western boundary of the site, to demonstrate the strength of the boundary following development. This additional information was provided through our representations to the Issues and Strategic Options consultation and is summarised within the Development Prospectus at Appendix EP1 (see pages 10 and 25). The information, which includes photographs and an illustrative cross-section, demonstrates that a robust defensible boundary already exists and can be enhanced. Appendix F of the Green Belt Assessment Part 4 endorses this conclusion, stating in relation to parcel TK27: "A new recognisable and permanent Green Belt boundary would be created consisting of Merelake Road to the south and through strengthening the existing western boundary."

Green Belt: conclusions

5.20 The site is well served by public transport and makes, at most, a moderate contribution to the Green Belt purposes. It does not make any contribution to preventing the merging of settlements. The development of the site would also result in defensible and permanent Green Belt boundaries. Therefore, having regard to paragraph 147 of the Framework and the unequivocal recommendation of the Green Belt Assessment to consider the site for release, the evidence base in relation to the Green Belt provides clear justification to release the site from the Green Belt to meet identified housing needs.

Technical considerations

5.21 A range of technical assessments have been undertaken to support the proposed allocation of the site.

These are summarised below. They have also been used to inform the concept masterplan set out in the Development Prospectus which is enclosed at Appendix EP1.

#### Highways and accessibility

5.22 The site has been assessed from a highways and accessibility perspective by Croft Transport Solutions (now

Eddisons), as set out within the Development Prospectus at Appendix EP1 of these representations and the Preliminary Transport Technical Note provided with our previous representations to the Issues and Strategic Options consultation. In summary:

- The site has an extensive frontage to Coppice Road, so a suitable vehicular access to the site can be achieved in a number of potential locations along Coppice Road. All of the land required to form the access falls within either the site boundary or the current limits of adopted highway.
- The site would generate a modest number of additional vehicular trips onto the local highway network. There are no particular capacity constraints to the local highway network. This analysis of the existing highway network has specifically included consideration of both the Coppice Road/Coalpit Hill/Merelake Road and the Coppice Road/A5011 junctions. Both would be able to accommodate the proposals.
- The site represents a highly accessible location close to a good range of shops, employment opportunities, education provision and other facilities and services. These are identified on the map at page 15 of the Development Prospectus. The site is also well-served by public transport with four bus services an hour passing the site on weekdays, connecting the site to the centres of both Hanley and Kidsgrove, and Kidsgrove railway station. An existing public footpath adjoins Coppice Road to the north of the site, providing access to those facilities on foot.

5.23 There is therefore no reason in highways terms why the site could not be developed.

#### Ecology

5.24 Ecological considerations can be summarised as follows:

- The site is presently used for grazing. The main features of ecological value within the site are likely to be the existing trees and hedgerows which mark the site's boundaries. It will be possible to retain these features as part of any development, save for the removal of a short section of hedgerow in order to form the site access.
- As well as retaining existing trees and hedgerows, landscape planting associated with the new development could include native species, increasing the ecological value of the site and achieving a biodiversity net gain. Any ponds associated with the site's surface water drainage scheme could also be designed in a manner that maximised their benefit for wildlife.
- No statutorily protected or non-statutorily protected sites exist on the site or immediately adjacent to the site. No statutorily protected sites exist within 2km of the site. The nearest non-statutorily protected site is the Bathpool Park Local Nature Reserve which lies around 1km to the east of the site, on the opposite side of Talke.
- Hacking Ecology has assessed the site and concluded that a 10% net gain in biodiversity can be delivered within the site's boundary in the context of the concept masterplan provided within the Development Prospectus at Appendix EP1.

5.25 There are therefore no ecological reasons why the site should not be developed.

#### Ground Conditions

5.26 The site is greenfield and is not known to be subject to any contamination that would preclude development.

5.27 In common with much of the local area, there are records of historic mine workings in the vicinity of the

site. An assessment of the impact of these workings on any development has been carried by e3p consulting engineers (provided with our representations to the Issues and Strategic Options consultation). Like large parts of the borough, the site is impacted by past mine workings. However, the part of the site that may need ground stabilization works is limited, at circa 11% of the site area. Even if that whole part of the site needed treating, this would not impair the viability of any development.

#### Flood Risk and Drainage

5.28 The site is located within Flood Zone 1 where the risk of flooding is considered to be low. Any development

of the site would incorporate a sustainable drainage system ('SuDS'). This would be designed to limit flows

to the greenfield run-off rate plus an allowance for climate change, so as not to increase the risk of flooding

either on the site or elsewhere. There are therefore no flood risk or drainage reasons why the site should not be developed.

#### Landscape and Visual Impact

5.29 An analysis of the landscape considerations is set out within the Development Prospectus at Appendix EP1.

In summary:

- The site is an agricultural field located between the current edge of the urban area and Merelake Road. It has an edge of settlement character and is contained by roads on all but one boundary. Hedgerows border the land to all sides, interspersed with a number of large trees mainly along the southern boundary. The western boundary includes a large hedgerow, with a small area of woodland in the field beyond. These features provide defensible boundaries and a strong sense of containment. This could be supplemented through a comprehensive landscaping scheme.
- The site slopes away from Coppice Road towards Merelake Road; on the opposite side of

Merelake Road, the land rises again. The result is a site with a tightly constrained visual envelope, with few long range views of the site. It is not visually prominent.

- There are no public footpaths through the site or immediately adjacent to it. Views of the site are largely limited to close range views from Merelake Road, Coppice Road and Barrie Gardens (to the north of Coppice Road).

- The development of any greenfield site will inevitably result in a change to the landscape character. It is the impact of that change which needs to be considered. In this case, the development of the site would not be incongruous in the location and setting at the edge of the settlement as the site is located between existing development and a road.

- The site would retain its key character elements of hedgerows and hedgerow trees, maintaining much of the visual screening already afforded the site. There is little visual relationship between the wider landscape and the site due to the topography, built form and intervening vegetation, which all limit views directly into the site.

5.30 The site is also assessed in the Landscape & Settlement Character Assessment Study Part 3: Site Specific

Landscape & Visual Appraisal (ED017). This concludes that the landscape sensitivity of the site is 'medium',

and the overall significance of the residual effects in relation to Sustainability Appraisal Objective 8 is 'moderate adverse'. The overall conclusion on site TK27 in the assessment is as follows:

"Smaller residential development on this site would have a moderate adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well designed development which respects the local character and distinctiveness."

5.31 This assessment compares favourably with other sites and draft allocations in the plan, and the impacts

are not considered to be 'significant'. There are therefore no landscape or visual impact reasons why the

site should not be developed, and the allocation of the site accords with the Council's landscape evidence. Heritage

5.32 The Heritage Site Assessments report (ED016) commissioned by the LPA have concluded that the site

scores 'Low' in relation to heritage sensitivity. The impact assessment concludes:

"The development of the site would result in the removal/alteration of agricultural land which currently makes a neutral contribution to the wider setting of local heritage assets. Depending on its design, the development of the site is anticipated to make similarly neutral contribution to the setting/significance of these heritage assets. The development will result in groundworks which have the potential to affect any hitherto undetected archaeological deposits within the site. These deposits are likely to relate to the former medieval and postmedieval agricultural use of the site, though may also include deposits/materials relating to the prehistoric period and early medieval periods.

While views towards the majority of heritage assets within the Talke Conservation Area (DST5730) from the north-west are already obscured by areas of topography, housing and tree-planting, there are still partial/glimpsed views of the churchyard of the Church of St Martin (1374385) from Coppice Road, immediately north of the site. It is possible that that the development of the site may impede or detract from these views, especially from the areas of post-1950s housing immediately north of the site."

5.33 The preliminary concept masterplan provided on page 24 of the Development Prospectus shows an area

of public open space to the east which would retain views to the south east, although views of the churchyard are screened by existing vegetation to the north of Audley Road.

5.34 The recommendations relating to a programme of archaeological recording could be implemented as part

of a scheme and would not impact upon the viability of the site.

5.35 There are therefore no heritage reasons why the site should not be allocated, with further detailed consideration given during the planning application stage.

Agricultural Land Quality

5.36 Reading Agricultural have undertaken an Agricultural Land Classification (ALC) assessment of the site. The

report concludes that approximately two thirds of the site comprise Grade 3a agricultural land, which is "Smaller residential development on this site would have a moderate adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well designed development which respects the local character and distinctiveness."

5.31 This assessment compares favourably with other sites and draft allocations in the plan, and the impacts

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undetected archaeological deposits within the site. These deposits are likely to relate to the former medieval and postmedieval agricultural use of the site, though may also include deposits/materials relating to the prehistoric period and early medieval periods.

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Agricultural Land Quality

5.36 Reading Agricultural have undertaken an Agricultural Land Classification (ALC) assessment of the site. The

report concludes that approximately two thirds of the site comprise Grade 3a agricultural land, which is the lowest category of 'best and most versatile' (BMV) agricultural land. The remainder is Grade 3b (i.e.

not BMV). The following points are relevant:

- The loss of around 1.8ha of Grade 3a agricultural land would not be considered 'significant' in the context of footnote 58 of the Framework.
- Much of this part of the borough consists of BMV. Any greenfield allocation is likely to result in the loss of at least some BMV agricultural land.
- In practical terms the land is unlikely to be farmed to its maximum potential. The size, topography and severance from wider holdings (being surrounded by highways, housing and a large hedgerow) all limit its ability to be efficiently farmed.

5.37 Therefore, agricultural land quality is not a constraint to the site's development, and it should be given no

more than limited weight in the site selection process.

Services

5.38 Searches of the main utilities providers have been carried out. These have confirmed that all main services

are available in this locality, and that connections can be made to the site.

Deliverability

5.39 There are no physical, technical or legal/ownership constraints to development, and the site could come

forward immediately for development.

5.40 SLG is an experienced land promoter with an established track record of delivering sites for residential development. It would be SLG's intention to sell the site to developer at the earliest opportunity. Indeed, SLG has in the recent past secured planning permission for 350 new homes on a greenfield site in Stokeon-

Trent, which is currently being developed by both Persimmon and Bellway (thereby maximising the delivery rate).

5.41 The site will therefore deliver in full during the plan period, and it would also contribute to the deliverable

5-year supply in the short term. SLG would be happy to enter into a Statement of Common Ground with the Council to confirm its intentions in terms of delivery.

Quantum of development

5.42 Policy TK27 states that the site is allocated for 90 dwellings. The enclosed Development Prospectus presents a concept masterplan, which demonstrates one way in which the site could deliver for approximately 90 dwellings in a high-quality scheme which reflects urban design best practice and considering all relevant technical matters, including access, drainage, services and green and blue infrastructure (as discussed above). Therefore, the proposed quantum of development is realistic based

on the available evidence.

Development criteria

5.43 As with all of the allocations, Policy TK27 sets out a series of development criteria. Generally, the criteria

are considered to be proportionate and reasonable in the context of the allocation. However, we propose the following amendments to the criteria

Criterion 8

5.44 Criterion 8 is set out below:

"Improvements required at Coppice Road / Merelake Road / Coal Pit Lane junction for highway safety reasons. Offsite footway improvements required on the site frontage and from the site to local school, bus stops and shops"

5.45 We consider that this criterion is not justified, as it is yet to be determined (such that it is specified as a

fixed requirement by policy) that improvements will be required at Coppice Road / Merelake Road / Coal Pit Lane. The need for such improvement is not specified within the Strategic Transport Assessment (ED011).



	<p>5.46 Although SLG are content to deliver highways improvements should they be required, the need for any off-site improvements to any nearby junctions is clearly a matter that will need to be considered through the Transport Assessment, prepared in consultation with the Local Highways Authority. A Transport Assessment is already required under Policies SA1 and IN2.</p> <p>5.47 Therefore, we proposed that the criterion should be replaced with the following text, to make clear that the issue is to be considered through the Transport Assessment: An assessment of the need for off-site highway improvements, including at the Coppice Road / Merelake Road / Coal Pit Lane junction, and offsite footway improvements.</p> <p>Criterion 9</p> <p>5.48 Criterion 9 requires financial contributions to improvements in the capacity of local schools and health facilities. We do not object to the principle of potentially providing such contributions, but given the fluid nature of school and health facility capacity, and to ensure any such contribution is lawful, the need for such contributions will need to be assessed at the planning application stage. We therefore consider that the policy should be amended as follows: Consideration of the need for proportionate financial contributions to improvements in the capacity of local schools and health facilities.</p> <p>Criterion 10</p> <p>5.49 Criterion 10 requires financial contributions to improvements to Talke Signals (A34 Newcastle Rd / Congleton Rd / Coalpit Hill). We recognise that this is identified as a potential plan-wide mitigation measure within the Strategic Transport Assessment (ED011, see section 8.6.1.1). Nevertheless, the need for improvements and the details of any scheme will still need to be determined through Transport Assessments. Any contributions will also need to be made on a proportionate basis, noting that there are several planned developments in Talke which would likely impact upon this junction to a greater degree than Site TK27. Certainly, on an individual basis site TK27 is unlikely to have any material impact on this junction. Therefore, to ensure any such contribution is lawful, the degree to which the proposal impacts upon the junction should be considered through the Transport Assessment.</p> <p>6. Summary and conclusions</p> <p>6.1 Site TK27: Land off Coppice Road, Talke is proposed as an allocation for a residential development of approximately 90 dwellings in the draft plan. We strongly support the allocation of the site. The allocation accords with the evidence base, including the site selection methodology and the Site Selection report.</p> <p>6.2 The site is well served by public transport and makes, at most, a moderate contribution to the Green Belt purposes. The development of the site would also result in defensible and permanent Green Belt boundaries. Therefore, having regard to paragraph 147 of the Framework and the unequivocal recommendation of the Green Belt Assessment to consider the site for release, the evidence base in relation to the Green Belt clear justification to release the site from the Green Belt to meet the identified housing needs of the borough and Kidsgrove.</p> <p>6.3 SLG has previously submitted a Development Prospectus, which provides a thorough analysis of the site context and the technical considerations for developing it and is provided at Appendix EP1. This demonstrates that the site could be delivered for 90 dwellings taking into account all relevant technical matters, including access, drainage, services and green and blue infrastructure.</p> <p>6.4 SLG is an experienced land promoter with an established track record of delivering sites for residential development. The site would deliver in full during the plan period, and it would also contribute to the deliverable 5-year supply in the short term. SLG would be happy to enter into a Statement of Common Ground with the Council to confirm its intentions in terms of delivery.</p> <p>6.5 The proposed allocation is therefore sound in the context of paragraph 35 of the Framework, in that it is:</p> <ul style="list-style-type: none"> <li>• Positively prepared – The allocation of the site would contribute to meeting the overall housing requirement, and the distribution of housing to Kidsgrove.</li> <li>• Justified – The allocation represents an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (i.e., the Council's own evidence base, and also the supporting evidence provided by SLG).</li> <li>• Effective – The site is deliverable during the plan period.</li> <li>• Consistent with national policy – All relevant aspects of national policy have been considered through the site selection process, including in relation to the consideration of technical matters such as highways, drainage and ecology.</li> </ul> <p>6.6 Whilst we strongly support the allocation, some minor amendments are required to Policy TK27 to ensure that the development criteria within the policy reflect the evidence base. Our representations set out proposed modifications to the criteria which the Council could incorporate into the plan.</p>
<b>Q7 Modification</b>	<p>5.50 We therefore propose that criterion 10 is amended as follows: <u>Consideration of the need for proportionate financial</u> Financial contributions to improvements to Talke Signals (A34 Newcastle Rd / Congleton Rd / Coalpit Hill).</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)



<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>
<b>Comment ID</b>	NULLP847
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	The Strategic Land Group
<b>Consultee Position</b>	Managing Director
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Paul
<b>Agent Company / Organisation</b>	Emery Planning
<b>Agent Position</b>	Director
<b>Agent Family Name</b>	Coxon
<b>Agent Given Name</b>	John
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	2. Chapter 5: Planning for Sustainable Development Policy PSD2: Settlement Hierarchy 2.13 Kidsgrove is identified as an urban centre, which is effectively the second tier of the hierarchy below the strategic centre of Newcastle-under-Lyme. It is also identified within the policy as a 'key location for growth'. This is strongly supported on the basis that Kidsgrove is an important centre in the borough and a highly sustainable location for accommodating future growth. We comment on how this translates into the distribution of development below.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	We wish to attend the hearings and make oral submissions, respond to the Inspector's questions and to the Council's case. The issues are complex and there is a need for detailed examination of the evidence.
<b>Q10 File 1</b>	6389337
<b>Attachments</b>	<a href="#">1305661 John Coxon.pdf</a> <a href="#">1305665 Strategic Land Group.pdf</a>

<b>Comment ID</b>	NULLP1429
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Philip
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1374
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Philip
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods</p>

	<p>affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP596
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that <i>“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”</i> In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6387688
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png (1)</a>
<b>Comment ID</b>	NULLP594
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Rebecca
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>



Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP237
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>I am really concerned about the impact that building this number of houses would have on the local community especially the road through Red Street which is already used as a rat run when there are issues on the A34. There have been numerous accidents this year due to increased volume in traffic including a young boy being knocked over.</p> <p>It is already difficult to get a doctors or dentist appointment in the local area and this would only get more difficult with an increase in population.</p> <p>Building on this scale would also have significant impact on the wildlife in the area. We need more green spaces for our well being and mental health not being subjected to lengthy building processes</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP238
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Smith
<b>Consultee Given Name</b>	Susan
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p>

When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP931
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy seeks to define Development Boundaries, Rural Centres and Other Settlement Boundaries within the draft Policy Map.</p> <p>Criterion 2 goes on to state that: "Within Development or Other Settlement Village Boundaries, development proposals will be supported where they are in keeping with the scale, role, and function of that settlement and do not conflict with any other relevant policy in the Local Plan." Whilst the Land East of Main Road, Betley site is located outside of the open countryside (and instead within the Green Belt) our client is broadly in support of this policy. However, given the Government's aspirations to release appropriate sites within the Green Belt to deliver new housing it is considered that it is not appropriate for all of the rural housing sites to be located outside of Green Belt land as this would not provide a balanced distribution of housing across the Borough (putting settlements such as Betley at a disadvantage).</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>
<b>Comment ID</b>	NULLP929
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	<p>Please see attached representations. Policy PSD 2 confirms that Rural Centres will meet some of the development need within the Borough. It identifies these centres as "the Rural Centres are Audley and Bignall End (joint), Baldwins Gate, Betley and Wrinehill (joint), Keele Village (with University Hub), Loggerheads, Madeley and Madeley Heath (joint)". Our client is broadly in support of this policy. However given the additional housing commitments that the draft National Planning Policy Framework indicates that the Borough will now face, it is recommended that Betley be recognised as a Rural Centre that can deliver greater growth than currently proposed. Importantly, paragraph 144 of the draft National Planning Policy Framework states that: "When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously developed, and only then consider other sustainable Green Belt locations. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land." [Knights' emphasis]</p> <p>The site would not be defined as 'Grey Belt' (as set out in Annex A) given its location within a conservation area. Nevertheless, the release of this land would nevertheless meet the aspirations of the government who are seeking to deliver housing in 'other sustainable Green Belt locations'. It is considered that this</p>

	<p>site could be one such site which would deliver an appropriate plan-led release of land in a way that would result in a logical extension to the village of Betley.</p> <p>Paragraph 155 goes on to state that:</p> <p>“Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:</p> <ul style="list-style-type: none"> <li>a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;</li> <li>b. Necessary improvements to local or national infrastructure; and</li> <li>c. The provision of new, or improvements to existing, green spaces that are accessible to the public.</li> </ul> <p>Where residential development is involved, the objective should be for new residents to be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”</p> <p>Having consideration to the above, the redevelopment of this site has the potential to deliver much needed market and affordable housing to the village to support its sustainable growth in a way that could enable the next generation of the village to continue to live within the village. The client owns substantial land around the proposed development site (including land immediately to the east of the cricket ground) which would enable improved sports facilities as well as opportunities for more accessible open space to serve the village.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>
<b>Comment ID</b>	NULLP933
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q6 Details</b>	<p>Please see attached representations.</p> <p>Knights have been instructed by Frank and Jayne Speed to promote Land east of Main Road, Betley as a housing allocation in the emerging Local Plan 2020-2040. The site measures 2.1 hectares and forms part of the wider land holdings of Betley Court Farm, which spans both sides of Main Road (hereon referred to as 'Betley Court Farm East'). The site is shown in Appendix A (see attachment). The site is located on the edge of the settlement boundary for Betley and is located within the Green Belt and the Betley Conservation Area. The site is shown in context on the adopted Policy Map in Figure 1 (see attachment)</p> <p>The site has not previously been promoted during the Local Plan process, and therefore a Call for Sites nomination form has been submitted in tandem with this representation. The Regulation 19 Plan does not propose any new housing allocations within Betley. However, this site would make a logical extension to the village to provide new housing in a sustainable location at the heart of the village, and would enhance the viability of services and facilities within the village.</p> <p>As above, it is acknowledged that based upon the Reg19 Plan, this site would not be presented by the Council as until now, it has not been on their radar. However, it is presented at this stage to assist the Council should they, for whatever reason, consider there is a need to allocate additional or alternative sites. The site will also continue to be promoted in respect of any early / future review of the plan.</p> <p>The site is predominantly utilised as agricultural land, however it does contain an occasional football field. Our client's land wraps around Betley's cricket ground (to the east of the site) and it is proposed that the redevelopment of this site would enable a football pitch to be re-provided to the east of the cricket ground and could incorporate improved changing facilities for both the football and cricket ground.</p> <p>In preparing this representation, our clients have instructed Hub Transport to consider the potential access point to the site and it has been established that the most suitable means of access would be in the northwest corner of the site off Main Road as illustrated in Figure 2 (see attachment). Hub Transport have reviewed the access and have confirmed that the plan in Figure 2 showing the approximate location of the access is the most suitable for vehicle and pedestrian access to the site. The proposed access location lies just to the south of the existing southbound bus shelter on Main Road. The Google Streetview extract in Figure 3 indicates the view from the street into the site at this location. The footway and verge along the site frontage with Main Road provide ample space for visibility splays within the highway extents</p>



	<p>for the existing 30mph speed limit. Providing access at this location would minimise the need for any tree removal within the highway and any tree loss could be re-provided on site. A simple priority access could be provided suitable to allow for the largest vehicle typically expected to access the site, such as a refuge vehicle.</p> <p>The proposal site is located close to the village centre and its facilities which include Betley C of E Primary School, The Swan Public House, Pool Farm veterinary surgery, Betley Village Shop, Betley Post Office, Betley Reading Room, Betley Village Hall, and St Margarets Church, and a Methodist Chapel. The overall promotion site includes a football pitch and the Betley Cricket Club. The intended relocation of the sports facilities to the east as part of the proposals would allow dwellings to lie in closer proximity to the local facilities and public transport opportunities. It would also potentially enable an improved parking provision for the sports facilities which would in turn minimise on-street parking elsewhere within the village.</p> <p>Footway provision is in good repair and suitable to cater for the additional demand created by a housing proposal. The closest part of the National Cycle Network to Betley is Route 551 which lies some way to the north. However, the roads within Betley are subject to a 30mph speed limit and suitable for cycle use by even less confident riders.</p> <p>Bus services are available immediately adjacent to the proposed site access with a shelter available for southbound travellers. Service number 85 serves Betley, travelling between Nantwich and Newcastle via Crewe and Keele. The service provides an approximate hourly frequency including services suitable to reach and return from employment and retail opportunities in Newcastle, Crewe, and Nantwich.</p> <p>The site is located within Flood Zone 1 (low probability of flooding) and therefore is suitable for residential development from a housing perspective. Any scheme would Figure 3 - Google Streetview image of proposed access location include a detailed flood risk assessment and drainage scheme to ensure satisfactory surface water management.</p> <p>Whilst the site is located within the Betley Conservation Area (as is much of the village) the sensitive redevelopment of this site for residential development would not result in a policy conflict. The Betley Conservation Area Appraisal identifies several important views through the site from Main Road (including the location where the site is proposed to be accessed) and from the adjacent cricket ground. The site is located within Character Area 1 'Southern approaches – Betley Court Farm and Betley Court'. Through a carefully considered layout and design (with input from a heritage consultant from the early stages of the design process) it is considered that the site could be redeveloped whilst retaining the significance of this heritage asset (most importantly retaining views across from Main Road to St Margaret's Church), as well as the setting of the nearby listed and positive buildings that bound the site.</p> <p>Our client's site is currently not proposed to be taken out of the Green Belt as part of the draft Local Plan and it is therefore recommended that this site be allocated as a residential development. At the very least, it is recommended that this site be identified as a safeguarded housing allocation if other allocated sites are unable to be delivered during the plan period.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>
<b>Comment ID</b>	NULLP930
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Please see attached representations. Betley and Wrinehill (joint) and Madeley and Madeley Heath (joint) are identified as providing in the order of 250 new homes during the Plan period. However, the draft Policy Map identifies that no allocations are identified within Betley or Wrinehill (with housing sites only located around the non-Green Belt elements of Madeley).</p> <p>However the expected increased housing requirements for the Borough that are anticipated to come through the changes to the National Planning Policy provide an opportunity to distribute growth across these two villages more evenly. The draft National Planning Policy Framework now acknowledged that there should be a focus on delivering sustainably located Green Belt sites (including greenfield sites) that do not contribute to the purposes of including land within the Green Belt. This will be explored in greater detail when commenting upon Draft Policy PSD5.</p> <p>As it stands, it is considered that this policy should be amended to allow some growth through an allocation in Betley.</p>

<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>
<b>Comment ID</b>	NULLP928
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that:  “A minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020 – 2040 which equates to 400 dwellings per annum.”  Notwithstanding the above, the draft National Planning Policy Framework identified that the Borough will need to deliver a further 193 dwellings per year in addition to this amount, which is likely to be accommodated through a future review of the plan.  The site at Land East of Main Road, Betley would make a contribution to the Council's housing provision on the edge of an established village which is a sustainable location, on the basis that if the Council consider as part of this process that additional sites need to be found, or other sites fail to come forward. It is therefore requested that Figure 2 ‘Local Plan Key Diagram’ be amended to identify Betley as an area to deliver new housing.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>
<b>Comment ID</b>	NULLP932
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Speed
<b>Consultee Given Name</b>	Frank and Jayne
<b>Agent Company / Organisation</b>	Knights PLC
<b>Agent Family Name</b>	Askew
<b>Agent Given Name</b>	Michael
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q6 Details</b>	<p>Please see attached representations. Criterion 1 of this policy states that:  “The Green Belt boundary is defined on the draft Policies Map.”  The Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment (November 2017) that was produced by Arup assesses the contribution that the individual parcels of Green Belt land have in respect to the five purposes of including them within the Green Belt. This site was identified as Parcel  which was focused around the southern portion of the village. When assessing this site, the report identified that the overall parcel had a ‘moderate contribution’ overall with only a ‘strong contribution’ in one area (to preserve the setting and special character of historic town) with the balance either assessed to have either a ‘modest contribution’, a ‘weak contribution’ or ‘no contribution’. It is however important that our client's site that is proposed for allocation consists of only a small portion of this wider parcel of land and consequently a carefully considered redevelopment is likely to have far less impact on purposes of including land within the Green Belt when viewed in isolation. The subsequent Parts 2 and 3 of the</p>

	<p>Green Belt Assessment make no reference to this site, furthermore the Green Belt Village Study (produced in July 2024) makes no reference to proposed changes to Betley's settlement boundary.</p> <p>As stated previously in this report, the draft National Planning Policy Framework supports sustainably located sites within the Green Belt to be used to deliver the identified housing growth. Such sites are not just restricted to 'Grey Belt' sites, which very few sites on the fringe of Betley (including this site) fall within the definition of, due to the allocation of the Betley Conservation Area which extends beyond the settlement boundary. Indeed, those sites that are on the fringe of Betley and outside of the conservation area have poor infrastructure links and would not provide a logical extension to Betley (i.e. are located behind linear rows of housing which would result in contrived site access locations). By comparison the allocation of our client's site would result in the logical rounding off of the southeastern portion of the village and would be seen as an area still very much at the heart of the village (due to its close proximity to St Margaret's Church, the cricket ground and the facilities and public transport links along Main Road). It is considered that the site itself does not contribute towards the five purposes of the Green Belt as set out in paragraph 143 of the current National Planning Policy Framework as demonstrated below:</p> <p>a) "to check the unrestricted sprawl of large built-up areas" – The rounding off of the southeastern portion of Betley would not result in the increase in size of the Staffordshire conurbation as it would involve the enlargement of a village.</p> <p>b) "to prevent neighbouring towns merging into one another" – The proposed allocation of this site would retain a substantial gap between the nearest village of Wrinehill to the south of the site. Indeed, there currently exists a strong ribbon development along both sides of Main Road further south of the site which function and have the visual appearance as part of the existing village of Betley.</p> <p>c) "to assist in safeguarding the countryside from encroachment" – The site would be reinforced by established, defensible boundaries including the cricket ground to the northeast, Main Road to the west and field boundaries to the south. The proposal would also reinforce these existing boundaries through new landscaped areas (including BNG enhancements).</p> <p>d) "to preserve the setting and special character of historic towns" – The Arup Green Belt Assessment Part 1 identified the Betley as being a historic town and therefore concluded this it had a strong contribution to this purposes of the Green Belt. Notwithstanding this, this does not mean that a wellconsidered housing scheme would automatically be harmful to the village's historic setting or adversely affect the Betley Conservation Area. In any event, the proposed development would be supported by a Heritage Impact Assessment that would demonstrate that the significance of the conservation area would be preserved through a well-considered design. By focusing on a consolidated area of redevelopment to round off this part of the village in a master-planned layout, this would be a more pragmatic approach than through other piecemeal development throughout the village which would likely erode the village's special historic character to a greater extent.</p> <p>e) "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" – Betley contains very little derelict land that could realistically come forward to provide a housing scheme of a scale that would deliver economic, social and environmental benefits to the extent that this site would. The overall quantum of housing provided, whilst of a scale beneficial to Betley, would not conflict with the wider development strategy proposed under draft Policy PSD 1.</p> <p>As a result, it is recommended that this site be also excluded from the Green Belt and instead allocated as a residential development.</p> <p>It is considered that the Draft Policy Map should be amended as set out in Figure 4. The suggested allocation also incorporates a number of rear gardens serving residential properties along Butts Lane to the north of the site which are considered to comprise a logical rounding off of the village (see attachment for Plan, figure 4) It has been demonstrated that there is a clear and robust argument in favour of removing Land East of Main Road, Betley from the Green Belt and allocating it as a residential development. The site would bring forward substantial benefits to Betley and the Borough as a whole and would align with the Government's aspirations to deliver 1.5 million homes during the next parliament (with the Borough identified as needing to accommodate 193 new homes per year). The proposal would provide much needed family market and affordable housing which is currently underprovided within Betley.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Knights wish to participate at the hearing sessions for Policies PSD3, PSD4 and PSD5 so that we can demonstrate why the Betley Court Farm, land east of Main Road, Betley site should be included as a residential allocation in the Policies Map. (I reattach the representations document again for ease of reference).
<b>Attachments</b>	<a href="#">1364272 Frank and Jayne Speed.pdf</a>

<b>Comment ID</b>	NULLP1208
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Spode
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Barthomley Road, Audley  LOCAL P1AN . POLICY . AB2. NOT SOUND  We feel the policy is not sound with regards to AB2 for the following reasons  1. Emergency access on Barthomley Road:  a) Single country lanes lead to this point that have blind bends  b) Not suitable or designed for large vehicles or increase in volume of traffic  c) Local housing on Barthomley Road near to the proposed access already have limited views to exit driveways so more potential for accidents  d) Local lanes used for recreational purposes i.e. horse riding (several livery's in the immediate vicinity), cycling, dog walking. Audley has a running club and a walking group who regularly use these lanes. Extra traffic could endanger all these activities  e) At the T junction between old Nantwich Road and Bafthomley Road there are old stone walls surrounding the junction and is an extremely tight bend for large vehicles to negotiate. We have witnessed a large lorry being stuck at this junction  0 We have concerns about how the emergency access will be controlled. If any vehicles are allowed to enter or exit at any time it would more than likely be used as a shortcut to avoid traffic congestion on the 4500 which does happen frequently  Why do we need massive warehouses taking up valuable greenbelt and good agricultural land when there are plenty of large empty available warehouses within a 10 mile radius that have much better transport links? Why are the Council satisfied that an additional 40 hectares of greenbelt land should be earmarked for this development when they have stipulated a much lower figure for employment land? This development will add to a very congested and busy A500 along with the additional air pollution and increase the risk of vehicle accidents both on this road and potentially on the M6 too if traffic is backed up.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1213
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Spode
<b>Consultee Given Name</b>	Pamela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Barthomley Road, Audley  LOCAL P1AN . POLICY . AB2. NOT SOUND  We feel the policy is not sound with regards to AB2 for the following reasons  1. Emergency access on Barthomley Road:  a) Single country lanes lead to this point that have blind bends  b) Not suitable or designed for large vehicles or increase in volume of traffic  c) Local housing on Barthomley Road near to the proposed access already have limited views to exit driveways so more potential for accidents  d) Local lanes used for recreational purposes i.e. horse riding (several livery's in the immediate vicinity), cycling, dog walking. Audley has a running club and a walking group who regularly use these lanes. Extra traffic could endanger all these activities  e) At the T junction between old Nantwich Road and Bafthomley Road there are old stone walls surrounding the junction and is an extremely tight bend for large vehicles to negotiate. We have witnessed a large lorry being stuck at this junction  0 We have concerns about how the emergency access will be controlled. If any vehicles are allowed to enter or exit at any time it would more than likely be used as a shortcut to avoid traffic congestion on the 4500 which does happen frequently Why do we need massive warehouses taking up valuable greenbelt and good agricultural land when there are plenty of large empty available warehouses within a 10 mile radius that have much better transport links? Why are the Council satisfied that an additional 40 hectares of greenbelt land should be earmarked for this development when they have stipulated a much lower figure for employment land? This development will add to a very congested and busy A500 along with the additional air pollution and increase the risk of vehicle accidents both on this road and potentially on the M6 too if traffic is backed up.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1212
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Spode
<b>Consultee Given Name</b>	Pamela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Barthomley Road, Audley  LOCAL P1AN . POLICY . AB2. NOT SOUND  We feel the policy is not sound with regards to AB2 for the following reasons  1. Emergency access on Barthomley Road:  a) Single country lanes lead to this point that have blind bends  b) Not suitable or designed for large vehicles or increase in volume of traffic  c) Local housing on Barthomley Road near to the proposed access alreadyhave limited views to exit driveways so more potential for accidents  d) Local lanes used for recreational purposes i.e. horse riding (several livery'sin the immediate vicinity), cycling, dog walking. Audley has a running club and a walking group who regularly use these lanes. Extra traffic could endanger all these activities  e) At the T junction between old Nantwich Road and Bafthomley Road there are old stone walls surrounding the junction and is an extremely tight bend for large vehicles to negotiate. We have witnessed a large lorry being stuck at this junction  0 We have concerns about how the emergency access will be controlled. If any vehicles are allowed to enter or exit at any time it would more than likely be used as a shortcut to avoid traffic congestion on the 4500 which does happen frequently  Why do we need massive warehouses taking up valuable greenbelt and good agricultural land when there are plenty of large empty available warehouses within a 10 mile radius that have much better transport links? Why are the Council satisfied that an additional 40 hectares of greenbelt land should be earmarked for this development when they have stipulated a much lower figure for employment land? This development will add to a very congested and busy A500 along with the additional air pollution and increase the risk of vehicle accidents both on this road and potentially on the M6 too if traffic is backed up.</p>

<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
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Stanworth, Katie

<b>Comment ID</b>	NULLP67
<b>Order</b>	177
<b>Title</b>	Site G&T 11 Land at Hardings Wood Road, Kidsgrove
<b>Consultee Family Name</b>	Stanworth
<b>Consultee Given Name</b>	Katie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	G&T11
<b>Q6 Details</b>	In response to your email regarding our above site, we obtained planning permission for a Showman's site, not Gypsy and Travellers, so please amend your records accordingly

Comment ID	NULLP44
Order	191
Title	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
Consultee Family Name	Stevenson
Consultee Given Name	Elizabeth
Q4 Part of document	Policy
Q4 Policy	LW53
Q5 Sound	No
Q6 Details	<p><b>Appeal against the draft Locat Plan</b></p> <p>Newcastle-under-Lyme Local Plan 2020-2040 Draft Local Plan (Regulation 19 stage)</p> <p>I consider the draft plan to be unsound, for the following reasons:- Page 129 "Policy LW53 Land at corner of Muckleston Wood Lane, Loggerheads. Its inclusion and allocation of LW53 for future housing development is not only contrary but also inconsistent with the current national policy, the NPPF 2023. Policy PSD3 – Distribution of Development (page 16), has no justification to qualify the numbers in the plan for this site or Loggerheads. Reasoning: - LW53 is not a sustainable location, therefore, in contrast to national policy, please reference the Councils Planning Committee of 27/02/2024, where this point was endorsed in the refusal of the planning permission for the development of housing on this specific site. Their reasons being, sustainability, lack of supporting infrastructure, limited transport facilities (increasing the need to travel by car to access employment, hospitals, retail and higher education facilities. Please also note the councils' own evidence in the Rural Area Topic Paper, (June 2021 para 124): Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities". This evidence and very recent refusal for development at the LW53 site emphasises that the site is not a sustainable location and is in contradiction to the NPPF 2023. Other points to consider in the case to remove LW53 from the plan are: LW53 currently being the best and most versatile agricultural land, (its inclusion would result in the loss of said agricultural land), contrary to Para. 180 of the NPPF (2023). As a greenfield site, its inclusion is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites. . The location of LW53 next to a grade II listed building and its development would irrevocably harm the setting of the building (again contrary to NPPF (2023)) The development would also have an adverse impact on the character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023). All the above points were recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site on 27/02/2024. Policy PSD3: Distribution of Development (page 16) There have been no presentation of numbers or evidence to justify why Loggerheads qualifies to take the burden of 450 dwellings, when compared to other rural centres where almost half this number is suggested. The increase in housing stock in Loggerheads since 2020 (plan start date) has already contributed a large number to this figure, how can, with the evidence and previous refusal by the Planning Committee (because of accessibility, infrastructure, agricultural loss, unsustainability and overall character impact) the inclusion of LW53 be acceptable and should be removed from the Draft Plan. The above factors bring into question the soundness of the Draft Plan, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee (27/02/2024) in its own refusal for the site, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023 and Rural Area Topic Paper (June 2021) and subsequently with no evidence or justification for the reference to the 450 dwellings increase, it should also be removed from the Draft plan.</p>
Comment ID	NULLP45
Order	26
Title	Policy PSD3: Distribution of Development
Consultee Family Name	Stevenson
Consultee Given Name	Elizabeth
Q4 Part of document	Policy
Q4 Policy	LW53
Q5 Sound	No

<p><b>Q6 Details</b></p>	<p><b><u>Appeal against the draft Locat Plan</u></b>  Newcastle-under-Lyme Local Plan 2020-2040  Draft Local Plan (Regulation 19 stage)  I consider the draft plan to be unsound, for the following reasons:-  Page 129 "Policy LW53 Land at corner of Mucklestone Wood Lane, Loggerheads.  Its inclusion and allocation of LW53 for future housing development is not only contrary but also inconsistent with the current national policy, the NPPF 2023.  Policy PSD3 – Distribution of Development (page 16), has no justification to qualify the numbers in the plan for this site or Loggerheads.  Reasoning: -  LW53 is not a sustainable location, therefore, in contrast to national policy, please reference the Councils Planning Committee of 27/02/2024, where this point was endorsed in the refusal of the planning permission for the development of housing on this specific site. Their reasons being, sustainability, lack of supporting infrastructure, limited transport facilities (increasing the need to travel by car to access employment, hospitals, retail and higher education facilities.  Please also note the councils' own evidence in the Rural Area Topic Paper, (June 2021 para 124):  Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".  This evidence and very recent refusal for development at the LW53 site emphasises that the site is not a sustainable location and is in contradiction to the NPPF 2023.  Other points to consider in the case to remove LW53 from the plan are:  LW53 currently being the best and most versatile agricultural land, (its inclusion would result in the loss of said agricultural land), contrary to Para. 180 of the NPPF (2023).  As a greenfield site, its inclusion is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.  .  The location of LW53 next to a grade II listed building and its development would irrevocably harm the setting of the building (again contrary to NPPF (2023))  The development would also have an adverse impact on the character of this part of Mucklestone Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023).  All the above points were recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site on 27/02/2024.  Policy PSD3: Distribution of Development (page 16)  There have been no presentation of numbers or evidence to justify why Loggerheads qualifies to take the burden of 450 dwellings, when compared to other rural centres where almost half this number is suggested.  The increase in housing stock in Loggerheads since 2020 (plan start date) has already contributed a large number to this figure, how can, with the evidence and previous refusal by the Planning Committee (because of accessibility, infrastructure, agricultural loss, unsustainability and overall character impact) the inclusion of LW53 be acceptable and should be removed from the Draft Plan.  The above factors bring into question the soundness of the Draft Plan, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee (27/02/2024) in its own refusal for the site, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023 and Rural Area Topic Paper (June 2021) and subsequently with no evidence or justification for the reference to the 450 dwellings increase, it should also be removed from the Draft plan.</p>
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<b>Comment ID</b>	NULLP781
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Stratton
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>Local Plan</b></p> <p>I believe the process of the local plan is generally unsound from an accessibility perspective. The plan was only available in braille from 25th September, giving little time for anyone who required braille to read through the whole plan. This documentation was only printed in braille following my request 8th August 2024 and no foresight had been made to make a copy generally available at the Newcastle library.</p> <p>At meetings, held by the council, there was no interpreter available, so anyone deaf would have had to rely on friends/family. The posters at the meeting used small fonts making it difficult to read the information.</p> <p>There was also no provision for an easy-read translation, despite this being requested.</p> <p>It was mentioned by Councillor Fear at a Council meeting that the local plan was accessible to all but as mentioned above, the reality shows that it wasn't.</p> <p>I also put in a Freedom of Information request to Newcastle Borough Council on the number of people registered blind in the area. The response was that they didn't know. This would suggest that there was little consideration to how the Council were going to engage with members of the public who have a disability/learning difficulties so they could be included in responding to the plan.</p> <p><b>Site AB2 'Land at Junction 16 of the M6'</b></p> <p>I consider the local plan is unsound in proposing it.</p> <p>The site put forward is significantly bigger than initially stated as required in the document. AB2 is 80 hectares of land but only 22 hectares of land is required for employment. The proportions would put the housing/employment land ratio out of balance and could result in further housing being required in the small village of Audley.</p> <p>AB2 would sit on a heavy section of the M6 which is prone to high numbers of accidents. Typically the stretch between Junction 14 to Junction 18 bottlenecks frequently due to high numbers of traffic and high numbers of accidents occurring. Junction 16 roundabout and the approaches from the A500 are traffic-heavy and it can often take over 10 minutes to join the motorway from Audley (a distance of a mile).</p> <p>There is no easy access to AB2 currently, except from Park Lane, a narrow single-track country road. In the plan, it mentions that this would still be used as an emergency exit/entrance, the road is unsuitable for multiple, large vehicles.</p> <p>There is no public transport that goes near to AB2. There is limited public transport to Audley Village centre, a good mile or so from the site. This would mean increased traffic in the area, increasing CO emissions and noise pollution. AB2 is a strong green belt contender with established vegetation trapping CO emissions and noise pollution from the M6.</p> <p>Less than a mile away from AB2, in a neighbouring council area (Cheshire East) are two large areas being made into warehouses. One is currently under construction (million square feet) and one was constructed with 5 warehouses currently sitting empty due to no electricity. Within Newcastle-under-Lyme warehouses are sitting empty, there was one in Talke that sat empty for over 10 years, it was taken on eventually by JCB but will now be empty again. Some other sites/locations would be less disruptive and retain this area of green belt.</p> <p><b>Site AB15 'Land North of Vernon Avenue'</b></p> <p>I consider the local plan is unsound in proposing it.</p> <p>Vernon Avenue has already seen growth on the road with the addition of Barleyfields, planning permission granted for 2 additional buildings and then just off Vernon Avenue, 3 bungalows. All this has had a significant impact on an already busy road that provides access to Vernon Close, Meadowside Avenue and Westfield Avenue.</p> <p>With cars parked on either side of the road, the road can at times be narrow to drive down and is often treated as a rat run. During 2021 a child was knocked down and injured and I am surprised the numbers aren't higher.</p> <p>The site is proposed to have 33 homes built on it. That would mean a potential increase of at least 50 extra cars to an already busy housing estate. It is located at the bottom of a hill meaning there isn't easy access to the village. In the Sustainability Appraisal on page J9 it mentions site assessments presented in Appendix H indicate poor access across indicators for health and transport and accessibility</p> <p>In the Sustainability Appraisal, Page 120, it confirms that AB15 lies outside the 800m sustainable distance for access to primary school. This could result in increased traffic in the village with parents taking their children to school.</p>

	<p>In the Sustainability Appraisal, page 19 it quotes "AB15 is situated within an area of 'high' sensitivity and has a 'moderate' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment"</p> <p>In the supporting evidence, Green Belt Assessment Part 4 Page D-3 it mentions that AB15 is a Moderate Contribution to Green Belt "The site falls within 250m of the Audley Conservation Area, therefore the site makes a moderate contribution to preserving the setting and special character of towns" On Page F-6 from the same report, there is a question regarding is the site in active use with a response of No. It is used every year from April to October housing 6 young cows. Local children love to come and see the cows.</p> <p>I would like to ask why other weaker sites weren't put forward to the local plan,</p> <p>Audley is a thriving busy village with schools and doctors at capacity. The local sewage works site is also at capacity. Adding 250 new homes to a small rural village would change the very nature and characteristics of the village. There are currently applications for other sites proposing 5-bedroom executive homes, these are neither affordable nor required housing for the housing needs of the village. Audley is an ex-mining village, with predominantly terraced houses. The elderly are requiring bungalows and the younger generation are requiring affordable housing (which does not include Shared Ownership). Sadly, the types of properties that could be built can't be defined.</p> <p>Thank you for taking the time to read my comments, I urge the council to review the sites in question.</p>
<b>Comment ID</b>	NULLP784
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Stratton
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p><b>Local Plan</b></p> <p>I believe the process of the local plan is generally unsound from an accessibility perspective. The plan was only available in braille from 25th September, giving little time for anyone who required braille to read through the whole plan. This documentation was only printed in braille following my request 8th August 2024 and no foresight had been made to make a copy generally available at the Newcastle library.</p> <p>At meetings, held by the council, there was no interpreter available, so anyone deaf would have had to rely on friends/family. The posters at the meeting used small fonts making it difficult to read the information.</p> <p>There was also no provision for an easy-read translation, despite this being requested.</p> <p>It was mentioned by Councillor Fear at a Council meeting that the local plan was accessible to all but as mentioned above, the reality shows that it wasn't.</p> <p>I also put in a Freedom of Information request to Newcastle Borough Council on the number of people registered blind in the area. The response was that they didn't know. This would suggest that there was little consideration to how the Council were going to engage with members of the public who have a disability/learning difficulties so they could be included in responding to the plan.</p> <p><b>Site AB2 'Land at Junction 16 of the M6'</b></p> <p>I consider the local plan is unsound in proposing it.</p> <p>The site put forward is significantly bigger than initially stated as required in the document. AB2 is 80 hectares of land but only 22 hectares of land is required for employment. The proportions would put the housing/employment land ratio out of balance and could result in further housing being required in the small village of Audley.</p> <p>AB2 would sit on a heavy section of the M6 which is prone to high numbers of accidents. Typically the stretch between Junction 14 to Junction 18 bottlenecks frequently due to high numbers of traffic and high numbers of accidents occurring. Junction 16 roundabout and the approaches from the A500 are traffic-heavy and it can often take over 10 minutes to join the motorway from Audley (a distance of a mile).</p> <p>There is no easy access to AB2 currently, except from Park Lane, a narrow single-track country road. In the plan, it mentions that this would still be used as an emergency exit/entrance, the road is unsuitable for multiple, large vehicles.</p> <p>There is no public transport that goes near to AB2. There is limited public transport to Audley Village centre, a good mile or so from the site. This would mean increased traffic in the area, increasing CO emissions and noise pollution. AB2 is a strong green belt contender with established vegetation trapping CO emissions and noise pollution from the M6.</p> <p>Less than a mile away from AB2, in a neighbouring council area (Cheshire East) are two large areas being made into warehouses. One is currently under construction (million square feet) and one was constructed with 5 warehouses currently sitting empty due to no electricity. Within Newcastle-under-Lyme warehouses are sitting empty, there was one in Talke that sat empty for over 10 years, it was taken on eventually by JCB but will now be empty again. Some other sites/locations would be less disruptive and retain this area of green belt.</p> <p><b>Site AB15 'Land North of Vernon Avenue'</b></p>

I consider the local plan is unsound in proposing it.

Vernon Avenue has already seen growth on the road with the addition of Barleyfields, planning permission granted for 2 additional buildings and then just off Vernon Avenue, 3 bungalows. All this has had a significant impact on an already busy road that provides access to Vernon Close, Meadowside Avenue and Westfield Avenue.

With cars parked on either side of the road, the road can at times be narrow to drive down and is often treated as a rat run. During 2021 a child was knocked down and injured and I am surprised the numbers aren't higher.

The site is proposed to have 33 homes built on it. That would mean a potential increase of at least 50 extra cars to an already busy housing estate. It is located at the bottom of a hill meaning there isn't easy access to the village. In the Sustainability Appraisal on page J9 it mentions site assessments presented in Appendix H indicate poor access across indicators for health and transport and accessibility

In the Sustainability Appraisal, Page 120, it confirms that AB15 lies outside the 800m sustainable distance for access to primary school. This could result in increased traffic in the village with parents taking their children to school.

In the Sustainability Appraisal, page 19 it quotes "AB15 is situated within an area of 'high' sensitivity and has a 'moderate' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment"

In the supporting evidence, Green Belt Assessment Part 4 Page D-3 it mentions that AB15 is a Moderate Contribution to Green Belt "The site falls within 250m of the Audley Conservation Area, therefore the site makes a moderate contribution to preserving the setting and special character of towns" On Page F-6 from the same report, there is a question regarding is the site in active use with a response of No. It is used every year from April to October housing 6 young cows. Local children love to come and see the cows.

I would like to ask why other weaker sites weren't put forward to the local plan,

Audley is a thriving busy village with schools and doctors at capacity. The local sewage works site is also at capacity. Adding 250 new homes to a small rural village would change the very nature and characteristics of the village. There are currently applications for other sites proposing 5-bedroom executive homes, these are neither affordable nor required housing for the housing needs of the village. Audley is an ex-mining village, with predominantly terraced houses. The elderly are requiring bungalows and the younger generation are requiring affordable housing (which does not include Shared Ownership). Sadly, the types of properties that could be built can't be defined.

Thank you for taking the time to read my comments, I urge the council to review the sites in question.

<b>Comment ID</b>	NULLP1135
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Stratton
<b>Consultee Given Name</b>	Catherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p><b>Local Plan</b></p> <p>I believe the process of the local plan is generally unsound from an accessibility perspective. The plan was only available in braille from 25th September, giving little time for anyone who required braille to read through the whole plan. This documentation was only printed in braille following my request 8th August 2024 and no foresight had been made to make a copy generally available at the Newcastle library.</p> <p>At meetings, held by the council, there was no interpreter available, so anyone deaf would have had to rely on friends/family. The posters at the meeting used small fonts making it difficult to read the information.</p> <p>There was also no provision for an easy-read translation, despite this being requested.</p> <p>It was mentioned by Councillor Fear at a Council meeting that the local plan was accessible to all but as mentioned above, the reality shows that it wasn't.</p> <p>I also put in a Freedom of Information request to Newcastle Borough Council on the number of people registered blind in the area. The response was that they didn't know. This would suggest that there was little consideration to how the Council were going to engage with members of the public who have a disability/learning difficulties so they could be included in responding to the plan.</p> <p><b>Site AB2 'Land at Junction 16 of the M6'</b></p> <p>I consider the local plan is unsound in proposing it.</p> <p>The site put forward is significantly bigger than initially stated as required in the document. AB2 is 80 hectares of land but only 22 hectares of land is required for employment. The proportions would put the housing/employment land ratio out of balance and could result in further housing being required in the small village of Audley.</p> <p>AB2 would sit on a heavy section of the M6 which is prone to high numbers of accidents. Typically the stretch between Junction 14 to Junction 18 bottlenecks frequently due to high numbers of traffic and high numbers of accidents occurring. Junction 16 roundabout and the approaches from the A500 are</p>



traffic-heavy and it can often take over 10 minutes to join the motorway from Audley (a distance of a mile).

There is no easy access to AB2 currently, except from Park Lane, a narrow single-track country road. In the plan, it mentions that this would still be used as an emergency exit/entrance, the road is unsuitable for multiple, large vehicles.

There is no public transport that goes near to AB2. There is limited public transport to Audley Village centre, a good mile or so from the site. This would mean increased traffic in the area, increasing CO emissions and noise pollution. AB2 is a strong green belt contender with established vegetation trapping CO emissions and noise pollution from the M6.

Less than a mile away from AB2, in a neighbouring council area (Cheshire East) are two large areas being made into warehouses. One is currently under construction (million square feet) and one was constructed with 5 warehouses currently sitting empty due to no electricity. Within Newcastle-under-Lyme warehouses are sitting empty, there was one in Talke that sat empty for over 10 years, it was taken on eventually by JCB but will now be empty again. Some other sites/locations would be less disruptive and retain this area of green belt.

#### **Site AB15 'Land North of Vernon Avenue'**

I consider the local plan is unsound in proposing it.

Vernon Avenue has already seen growth on the road with the addition of Barleyfields, planning permission granted for 2 additional buildings and then just off Vernon Avenue, 3 bungalows. All this has had a significant impact on an already busy road that provides access to Vernon Close, Meadowside Avenue and Westfield Avenue.

With cars parked on either side of the road, the road can at times be narrow to drive down and is often treated as a rat run. During 2021 a child was knocked down and injured and I am surprised the numbers aren't higher.

The site is proposed to have 33 homes built on it. That would mean a potential increase of at least 50 extra cars to an already busy housing estate. It is located at the bottom of a hill meaning there isn't easy access to the village. In the Sustainability Appraisal on page J9 it mentions site assessments presented in Appendix H indicate poor access across indicators for health and transport and accessibility

In the Sustainability Appraisal, Page 120, it confirms that AB15 lies outside the 800m sustainable distance for access to primary school. This could result in increased traffic in the village with parents taking their children to school.

In the Sustainability Appraisal, page 19 it quotes "AB15 is situated within an area of 'high' sensitivity and has a 'moderate' overall contribution to the purposes of the Green Belt according to the LSCA and Green Belt assessment"

In the supporting evidence, Green Belt Assessment Part 4 Page D-3 it mentions that AB15 is a Moderate Contribution to Green Belt "The site falls within 250m of the Audley Conservation Area, therefore the site makes a moderate contribution to preserving the setting and special character of towns" On Page F-6 from the same report, there is a question regarding is the site in active use with a response of No. It is used every year from April to October housing 6 young cows. Local children love to come and see the cows.

I would like to ask why other weaker sites weren't put forward to the local plan,

Audley is a thriving busy village with schools and doctors at capacity. The local sewage works site is also at capacity. Adding 250 new homes to a small rural village would change the very nature and characteristics of the village. There are currently applications for other sites proposing 5-bedroom executive homes, these are neither affordable nor required housing for the housing needs of the village. Audley is an ex-mining village, with predominantly terraced houses. The elderly are requiring bungalows and the younger generation are requiring affordable housing (which does not include Shared Ownership). Sadly, the types of properties that could be built can't be defined.

Thank you for taking the time to read my comments, I urge the council to review the sites in question.

<b>Comment ID</b>	NULLP590
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Stringer
<b>Consultee Given Name</b>	Edward
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>To whom it may concern, I am writing to object to the Policy AB2 Land at Junction 16 of M6.</p> <p>I believe the plans are both unsound and unjustified; primarily but not exclusively for the following reasons:</p> <p>Already heavily congested transport routes in and around Junction 16 of the M6.</p> <p>In the case of any local accidents/breakdowns the impact on minor road routes in and around the village of Audley is already excessive – before any plans of the scale proposed are considered.</p> <p>Irreversible destruction of the green belt land/historical rural and agricultural land in the area.</p> <p>Disproportionate scale of planning proposal.</p> <p>I wish to see the removal of the site from the local plan.</p>

Summerfield, William and James, Hawksworth, Lauren

<b>Comment ID</b>	NULLP591
<b>Order</b>	169
<b>Title</b>	Keele
<b>Consultee Family Name</b>	Summerfield
<b>Consultee Given Name</b>	William and James
<b>Agent Family Name</b>	Hawksworth
<b>Agent Given Name</b>	Lauren

<p><b>Q6 Details</b></p>	<p>FAO: Planning Policy department  PLANNING AND COMPULSORY PURCHASE ACT 2004  NEWCASTLE FINAL DRAFT PLAN REGULATION 19 CONSULTATION  REPRESENTATIONS IN RESPECT OF SITES KL33 AND KL34  We write in respect of our clients, William and James Summerfield, in response to the Newcastle Final Draft Plan  Regulation 19 Consultation.  The Regulation 19 Local Plan sets out the key priorities for the Borough through the plan period to 2040 and the commitments to deliver a successful and sustainable Borough which supports healthy, active and safe communities with accessible town centres for all. The regulation 19 Plan allocates sites for housing and employment to provide certainty on where growth will occur.  It is encouraging to see that the Council are recognising the need for growth around Keele, the University and surrounding areas. This is considered to be an appropriate opportunity to support student accommodation and employment uses. The draft Local Plan (Regulation 19) version plans for 400 homes per annum, in excess of the Government's current standard method, which would require 347 dwellings per annum. This is a positive approach, if the sites are deliverable. The NPPF supports delivery above the standard method, where justified by local economic growth strategy. We do have concerns regarding the Council's approach to future growth, particularly later in the plan period, and in the context of upcoming Government changes to the NPPF and the Revised Method for housing need. The indicative table issued as part of the recent national public consultation in relation to planning reform suggests that there will be a significant increase in housing need to 593 dwellings per annum for the Borough. This is a significant uplift and will require a substantial review of new sites far in excess of the additional land already included in the draft Regulation 19 Local Plan.  Green Belt  The Council have undertaken a Green Belt review and propose to release a number of sites from the Green Belt, to be allocated for development. We support the proposed review of Green Belt boundaries and the principle of release to meet local need.  In the context of the proposed national planning reform, there is concern that the Council have not appropriately assessed existing Green Belt sites which are available and deliverable to ensure robust Green Belt boundaries which will endure beyond the Plan period.  We are disappointed to see that sites KL33 and KL34 have not been identified for release or allocated for future development. As identified within our Regulation 18 written representations, we have concerns regarding the Site Selection process undertaken, and the conclusions of the Green Belt Assessment.  The 2024 Green Belt Site Review: Consolidated Report includes a detailed assessment of Site KL33, within our client's ownership. The site was scored as 'majority green' and suitable for development, except for the fact that it is considered to be detached from the urban area of Keele village and Keele University and hence was not recommended to be taken forward.  We would strongly disagree with this assessment. The land is immediately adjacent to the existing settlement of Keele village, to the immediate north east of the church and existing dwellings on Church Fields. The University facilities and sports centre are adjacent on the opposite side of Keele Road. The land presents a significant opportunity to support the key priorities of the Borough, to deliver new development such as residential, student or supporting infrastructure such as car parking for the University, or overarching sustainability objectives.  The release of all or part of our client's land would make a valuable contribution towards new development in Keele, meeting the identified need, have limited site constraints and meet the criteria of available, viable and deliverable. The Council's own evidence base concludes that the sites score moderately against the Green Belt principles. In order to have a sound and robust approach to the Local Plan, the Council should include additional sites alongside KL13. Sites KL33 and KL34 are well suited to future development, whether residential or supporting infrastructure, in close proximity to the University, and other strategic growth for the Borough.  We welcome any ongoing engagement with the Local authority to discuss the future use of these sites as part of this Local Plan review, or subsequent processes upon adoption of the new NPPF and standard housing method.</p>
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<b>Comment ID</b>	NULLP35
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Family Name</b>	Surdhar
<b>Consultee Given Name</b>	Ranjh Singh
<b>Q4 Part of document</b>	Policy
<b>Q5 Legally compliant</b>	Yes
<b>Q6 Details</b>	Astro-Pitch Silverdale Park, Opposite Post Office. Need Planning Permission Chad. Comply dutys. Undertake ground work.
<b>Q7 Modification</b>	Modification's Park. Toilets. Kids, Mens & Womens. Local Plan. Newcastle Council Depts.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Planning Permission. Astropitch Hockey. Football. 'Hire' out schools, colleges, universitys. Maybe Clubs
<b>Comment ID</b>	NULLP145
<b>Order</b>	111
<b>Title</b>	Policy SE6: Open Space, Sports and Leisure Provision
<b>Consultee Family Name</b>	Surdhar
<b>Consultee Given Name</b>	Ranjh Singh
<b>Q4 Part of document</b>	Policies Map
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	Astro-Pitch Silverdale Park. Opposite Post Office. Football, Hockey, Cricket. Hire schools, university, clubs. Leek Hockey Club. [redacted by admin] gold medalist Seoul Olympic games 1988 I know [redacted by admin] Stone Hockey Club, Ex-Hockey Player
<b>Q7 Modification</b>	Plan Permissions Council Dept. Newcastle-u-Lyme Stoke-on-Trent. Staffordshire I am [redacted by admin]
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Hearing Sessions. Future developments in Silverdale. Newcastle-u-Lyme/ Staffordshire. Housing Aspire or Private leaseholds. Business developments Silverdale empty shops near chip shop, warehouse, DIY shop, Charity shop, Barbers. Housing inspector & Development's Stoke-on-Trent

Comment ID	NULLP81
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Sutton
Consultee Given Name	Beth
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Newcastle-under-Lyme Local Plan Regulation 19 pre-submission consultation Strategic Employment (logistics) site (AB2) on land adjacent to Junction 16 of the M6</b></p> <p>I'm a resident of (redacted by admin) Audley and am extremely concerned at this potential Strategic location site in the Local Plan. I made representations in July 2023 and maintain my strong objection to this allocation. The development of this site will dramatically and adversely affect the character of my local neighbourhood and my quality of life.</p> <p><b>.The site is within the North Staffs Green Belt (not a Grey Belt in this location)</b> and its development will undermine this fundamental and well-established policy, particularly since there are alternative brown field locations close to the principal road / rail network within the North Staffs conurbation much more suited to employment use.</p> <p><b>• The land is in productive agricultural use.</b></p> <p>• Given the isolated location of this site its development would <b>lack any sustainability</b> — not served by any public transport: totally dependent for its operation on the motor vehicle creating additional congestion and pollution: remote from any community facility essential to sustain the requirements of everyday life.</p> <p>• We already experience <b>severe congestion problems in relation to Junction 16</b>. Such a proposal would only exacerbate this, given that the development would presumably be designed to feed out onto this junction. Major reconstruction works would be required in relation to this junction with all its associated disruption which would make the operation of everyday life and communication links intolerable.</p> <p>• <b>The local lanes around my home are narrow and tortuous and already severely congested and dangerous</b> - traffic attempting to circumnavigate Audley centre to try to reach Junction 16. This is in addition to local traffic and numerous heavy farm vehicles. Development of the scale proposed will overload even more the local road network.</p> <p><b>I urgently request the Borough to remove this allocation from the Local Plan and further investigate the potential of Brown Field Sites.</b></p> <p>I will be pleased if you will acknowledge this representation and keep me apprised of the next stages in the preparation of the Plan.</p>



<b>Comment ID</b>	NULLP577
<b>Order</b>	236
<b>Title</b>	Policy TC7 Land bound by Ryecroft, Ryebank , Merrial Street, Corporation Street and Liverpool Road, Newcastle
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC7 Clause 5
<b>Q6 Details</b>	<p>We are concerned about the potential impact to the listed heritage assets within this site. The HIA sets out that there is a potential for harm but there is limited further assessment or mitigation measures identified to overcome the harm. Clause 5 and Clause 6 do include some details but we need to be sure that any potential harm to these heritage assets can be overcome and suggest additional detail is included.</p> <p>The three relevant clauses within the policy set out the relevant issues, except the potential harm to Keele Hall RPG, Keele Hall Conservation Area and associated heritage assets and the broader cumulative impact for these sites and any mitigation measures that can overcome this harm</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP581
<b>Order</b>	246
<b>Title</b>	Policy TC45 York Place, Newcastle Town Centre
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC45
<b>Q6 Details</b>	<p>Add in details to the policy regarding the potential impact on Grade II* St Giles Church and what mitigation measures are required to overcome the harm.</p> <p>Additional detail is required to be included about a number of heritage assets that could be harmed through this development and incorporate the specific mitigation measures into the Plan.</p> <p>Additionally, consider the cumulative impacts of a number of proposed allocations affecting the same heritage assets, and how this can be overcome.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP585
<b>Order</b>	8
<b>Number</b>	2
<b>Title</b>	Introduction
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q6 Details</b>	<p>The Plan would be much more legible if the policy areas were identified in some way; either through text boxes or varying colours etc. to identify the difference between policy text and supporting text/evidence base.</p>
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>

<b>Comment ID</b>	NULLP565
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17 Clause 4
<b>Q6 Details</b>	Additional detail is required to be included in the Plan to overcome potential harm identified and to consider the cumulative impact to identified heritage assets and how this may be overcome.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP504
<b>Order</b>	24
<b>Title</b>	Policy PSD2: Settlement Hierarchy
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD2
<b>Q6 Details</b>	We welcome the reference to heritage within the final clause of the policy and a brief reference to historic character within the third clause. The policy should clearly reference to need to protect the significance of heritage assets and their setting within all four clause as the issues are equally relevant within all the locations.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP508
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE 2 Clause 3
<b>Q6 Details</b>	We support the reference to the historic environment and welcome its inclusion. How will a 'significant adverse impact' be assessed? We would recommend the clause is amended to 'harm'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP512
<b>Order</b>	72
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson

<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	8.13
<b>Q6 Details</b>	Amend 'historic assets' with 'heritage assets'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP516
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1 Clause 5
<b>Q6 Details</b>	We support the inclusion of this clause and the reference to the historic environment.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP520
<b>Order</b>	96
<b>Title</b>	Policy IN6 Telecommunications Development
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN6 Clause 1e
<b>Q6 Details</b>	Amend to 'would not harm the significance of a heritage asset, including its setting'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP524
<b>Order</b>	127
<b>Title</b>	Policy SE14: Green and Blue Infrastructure
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE14
<b>Q6 Details</b>	This policy should have a clause within it relating to heritage assets and the need to protect their significance, including setting. Heritage is an integral component of landscape and one of the features of green and blue infrastructure, and as such the policy should reference how to deal with this aspect of it.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP528

<b>Order</b>	136
<b>Title</b>	Policy RUR4: Replacement Buildings Outside of Settlement Boundaries
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RUR 4, Clause 2i
<b>Q6 Details</b>	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP532
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>Clause 11, what specific mitigation measures in the Council's own HIA can be utilised here to ensure that harm to heritage assets will not occur and guide appropriate development at the planning application stage. Clause 12, the development should ensure the retention of heritage assets on site. Additionally, based on the HIA findings an archaeological assessment will be required as the potential for archaeological remains is high. Separate the clause relating to retention of assets and need for archaeological assessment.</p> <p>Further, the supporting information should set out more detail about the specific requirements set out in the HIA that need to be addressed via the development.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP536
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15 Clause 7
<b>Q6 Details</b>	We remain concerned about the heritage assets listed including Keele Hall Registered Park and Garden, and associated heritage assets and Keele Hall Conservation Area. The HIA is very limited in detail with regards to the impacts for Keele Hall RPG and other heritage assets and the impact of the development on these assets. The avoidance, mitigation and enhancement measures identified in the Council's own heritage impact assessment need to be fully considered and included within the clause.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP540
<b>Order</b>	191

<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53 Clause 5
<b>Q6 Details</b>	Additional detail from the HIA needs to be brought into the Plan to include the mitigation measures set out, including the need to protect long range views to and from White House Farmhouse.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP544
<b>Order</b>	207
<b>Title</b>	Policy SP22 Former Playground off Ash Grove, Silverdale
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP22 Clause 5
<b>Q6 Details</b>	This clause is welcomed. No reference to Keele Hall RPG or cumulative effects.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP548
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10 Clause 6
<b>Q6 Details</b>	Additional detail should be incorporated within this clause to set out the specific mitigation measures required.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP563
<b>Order</b>	223
<b>Title</b>	Supporting information
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.222

<b>Q6 Details</b>	This paragraph discusses the need for design to respond positively to the nearby heritage assets but what harm was identified through the HIA and how can this be overcome by site specific requirements.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP575
<b>Order</b>	226
<b>Title</b>	Policy TK27 Land off Coppice Road, Talke
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK27 Clause 4
<b>Q6 Details</b>	We welcome the additional detail included within clause 4 which helps to set out the issues and mitigation measures required.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP579
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	We recommend the consideration of cumulative impacts and whether any additional mitigation measures can be identified to overcome the cumulative impact of a number of developments.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP583
<b>Order</b>	250
<b>Title</b>	Policy TC52 Goose Street Car Park, Newcastle
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC52
<b>Q6 Details</b>	We consider additional detail is required to be included in the Plan, in relation to a number of heritage assets where harm could occur. The HIA sets out some additional detail and we consider that the mitigation measures need to be more specific to ensure that harm is overcome/ can be mitigated
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP502
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy



<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1 Clause 4
<b>Q6 Details</b>	Ensure that the historic environment is appropriately referenced within this section, to ensure that any issues for the historic environment and the significance of heritage assets, including their setting are fully considered.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP506
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	There is currently no reference to the historic environment, heritage assets and their setting and how new design should respond to the historic character of areas and assets. We would expect to see reference to heritage within a design policy and recommend the Council incorporate a separate clause to deal with this issue and ensure that new design considers its impact on heritage assets such as Conservation Areas as well as the local distinctiveness and character of local areas which define a sense of place in Newcastle under Lyme
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP510
<b>Order</b>	39
<b>Title</b>	Policy CRE2: Renewable Energy
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE 2 Clause 8
<b>Q6 Details</b>	Reference should be made for the need to protect the significance of heritage assets and their settings, within this clause.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP514
<b>Order</b>	81
<b>Title</b>	Policy RET4: Newcastle-under-Lyme Town Centre
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	RET 4 Clause 3
<b>Q6 Details</b>	We support the inclusion of this clause.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP518
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1 Clause 13
<b>Q6 Details</b>	Does the Council have any evidence available to highlight what assessment has been undertaken regarding the potential harm for heritage assets, before the routes are allocated for development? There is no additional information available in the supporting information or evidence base section.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP522
<b>Order</b>	108
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	11.19
<b>Q6 Details</b>	This paragraph references heritage and we support this. The reference is to consider heritage assets and how SuDs can complement them. It may also be useful to cite that only appropriate SuDs schemes should be accepted and the harm to heritage assets and their setting needs to be fully considered and avoided. Any potential changes to the watercourse could have an impact on heritage assets further down the watercourse, for example affecting waterlogged archaeology, amongst other types. It would be useful to include this issue within the policy text itself rather than solely in the supporting information.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP526
<b>Order</b>	134
<b>Title</b>	Policy RUR3: Extensions and Alterations to Buildings Outside of Settlement Boundaries
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RUR 3, Clause 1e
<b>Q6 Details</b>	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>

<b>Comment ID</b>	NULLP530
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Page 102, Table 6 Masterplans
<b>Q6 Details</b>	Where appropriate masterplanning work should also be consulted on with statutory consultees. For example, if there is a development affecting a heritage asset, which requires a master plan, it would be useful to have a requirement to liaise with Historic England (where relevant).
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP534
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13 Clause 8
<b>Q6 Details</b>	Consider the wording used to identify this mitigation measure. It should be clear that a landscape buffer is required and why and this should form part of any masterplanning/ planning application submission. The HIA identifies other mitigation measures that should be brought into the Local Plan to ensure that harm is minimised, if this development goes ahead.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP499
<b>Order</b>	16
<b>Title</b>	Vision for the Borough
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	4.2
<b>Q6 Details</b>	We welcome reference to the historic environment within the Vision
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP576
<b>Order</b>	231
<b>Title</b>	Policy TB19 Land South of Newcastle Golf Club, Thistleberry
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser

<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TB19
<b>Q6 Details</b>	<p>We have concerns over the cumulative impact for identified heritage assets set out in the HIA. How has this been assessed and how can this harm be overcome?</p> <p>The three relevant clauses within the policy set out the relevant issues, except the potential harm to Keele Hall RPG, Keele Hall Conservation Area and associated heritage assets and the broader cumulative impact for these sites and any mitigation measures that can overcome this harm</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP580
<b>Order</b>	244
<b>Title</b>	Policy TC40 Car Park, Blackfriars Road, Newcastle
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC40
<b>Q6 Details</b>	<p>Add in details to the policy regarding the potential impact on Grade II* St Giles Church and what mitigation measures are required to overcome the harm.</p> <p>Additional detail is required to be included about a number of heritage assets that could be harmed through this development and incorporate the specific mitigation measures into the Plan.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP584
<b>Order</b>	252
<b>Title</b>	Policy TC71 Midway Car Park, Newcastle-under-Lyme Town Centre
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC71
<b>Q6 Details</b>	<p>The policy should refer to the Newcastle under Lyme Conservation Area. How will this asset be affected and how can any identified harm be overcome? What specific mitigation measures can be incorporated into the Local Plan policy?</p> <p>There are a number of heritage assets that are identified within the HIA that could be harmed but limited detail within the policy as to the specific mitigation measures that will be required.</p> <p>The potential for archaeological remains is high for this site and we are concerned about the potential impact development will have on these heritage assets and whether there are suitable mitigation measures that can overcome this harm.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP507
<b>Order</b>	37

<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE 1
<b>Q6 Details</b>	There is currently no reference to the historic environment, heritage assets and their setting and how climate change/ renewable energy generation should respond to the historic character of areas and heritage assets. Whilst we recognise that this policy is focussing on responding to climate change, it is necessary to set out that how that response is delivered may need to occur in a different way for heritage assets and this should be clear in the policy. A strategy to also protect existing building from demolition and re-purpose heritage assets for appropriate uses would also be beneficial to ensure the re-use of existing embedded carbon rather than focus on the need for new development.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP511
<b>Order</b>	71
<b>Title</b>	Policy EMP3: Tourism
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP3 Clause 2
<b>Q6 Details</b>	We support a reference to the historic environment within this clause. Further, the Policy should be clear that it supports heritage tourism and will seek opportunities for appropriate heritage tourism.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP515
<b>Order</b>	83
<b>Title</b>	Policy RET5: Kidsgrove Town Centre
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET5
<b>Q6 Details</b>	This policy would benefit from the inclusion of the same clause, as in, Policy RET4 Clause 3.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP519
<b>Order</b>	88
<b>Title</b>	Policy IN2: Transport and Accessibility
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN2
<b>Q6 Details</b>	This policy should include a clause on the historic environment and the needs to protect the significance of heritage assets, including their setting. Whilst we recognise the Plan is intended to be read as a whole, the policy itself does deal with a wide range of issues and in that respect, heritage should be listed as one. Under the section dealing with waterways, Clause 6, it would be beneficial to include a reference to heritage assets to include such types as Canal Conservation Areas etc.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP523
<b>Order</b>	117
<b>Title</b>	Policy SE9: Historic Environment
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylorson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE9
<b>Q6 Details</b>	<p>We welcome the inclusion of a specific policy for the historic environment.</p> <p>Clause 1, a) considers a wide range of issues and may be more readable if the issues are broken down into bullet points, so that it is clear how each of the issues need to be considered.</p> <p>Links to the specific urban and townscape heritage characterisation studies would be useful.</p> <p>e) we support the reference to Conservation Area Appraisals and Management Plans. A link to these would also be beneficial.</p> <p>Clause 2. In the first instance the policy should set out that where a proposal will cause harm to a heritage asset, this should be resisted. The National Planning Policy Framework (NPPF) is clear that heritage assets are an 'irreplaceable resource' and any harm should be 'wholly/ exceptional' (NPPF paragraphs 195/206). The policy should set out a hierarchical approach on how harm will be resisted, and all opportunities sought to avoid and mitigate harm, enhancement measures sought and only after all other issues have been exhausted would the issues of public benefit tests and clear and convincing justification apply.</p> <p>Consider the hierarchy within this policy between clause a and b. If clause a is to be resisted, then it stands that clause b should also be resisted.</p> <p>c) Less than substantial harm may still amount to considerable harm and reason for planning applications to be refused. It may be that the public benefit tests apply but in the first instance development which causes less than substantial harm should be resisted and more suitable locations sought.</p> <p>g) we support the inclusion of the two bullet points in this clause and consider both are essential. No demolition should occur before it has been confirmed that the development will go ahead.</p> <p>Clause 3, b) Proposals should include in their HA where harm may occur so that the Local Authority can make an informed decision. The HA should further include avoidance/mitigation measures where they are possible. Where harm cannot be avoided then applications should be refused, except in exceptional circumstances in line with the NPPF.</p> <p>Clause 4, b) Consider removing from the Plan. Enabling development is development that is contrary to policy and as such does not sit comfortably within a policy. It is beneficial to have a section on heritage at risk and the Plan to provide a positive strategy for these assets. However, an enabling development strategy may not be the best approach and all viable options should be considered in the first instance to ensure harm will not occur to these heritage assets.</p> <p>Clause 5, this information would be beneficial in the Shopfront and Advertisement Policy. Inappropriate shopfronts, signage, lighting and shutters should be refused.</p> <p>There is no policy clause included within the Plan to assess archaeological features, including designated archaeology, non designated archaeology and non designated archaeology that has the potential to be of national importance. The policy should include a clause for archaeology and further set out details about the requirements for archaeological assessment including desk based and field evaluation, to be carried out by an appropriate professional.</p> <p>Does the Council have a local list of non designated heritage assets? If so this should be incorporated in the policy text.</p> <p>It would be beneficial for the policy to set out the need to assess setting, where it contributes to significance and how development proposals need to respond to this, including details on views analysis.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>



<b>Comment ID</b>	NULLP527
<b>Order</b>	136
<b>Title</b>	Policy RUR4: Replacement Buildings Outside of Settlement Boundaries
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RUR 4, Clause 1g
<b>Q6 Details</b>	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP531
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Page 103, Table 6, Masterplans
<b>Q6 Details</b>	We support the conditions set out in the general requirements policy and the tie into the historic environment policy SE9.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP535
<b>Order</b>	171
<b>Title</b>	Supporting Information
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	13.77
<b>Q6 Details</b>	Additional detail will be required to ensure that development is able to avoid/mitigate harm to heritage assets.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP539
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	LW53 Clause 4
<b>Q6 Details</b>	Draw through the specific mitigation measures, for example evaluation trenching.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP543
<b>Order</b>	207
<b>Title</b>	Policy SP22 Former Playground off Ash Grove, Silverdale
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylorson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP22 Clause 4
<b>Q6 Details</b>	We remain concerned about the impact to Silverdale Conservation Area and St Luke's Church Grade II. As well as the impact to the significance of Keele Hall Registered Park and Garden. There is no detail within the impact section of the HIA on how these assets will be affected. Additionally, there is a reference to less than substantial harm from a cumulative impact, but this has not been addressed as to how this harm could be overcome.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP538
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylorson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53 Clause 3
<b>Q6 Details</b>	Draw through the specific mitigation measures required for example retention of trees and hedgerows.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP542
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylorson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11 Clause 3
<b>Q6 Details</b>	<p>We have concerns regarding this site given the number of nearby heritage assets and the lack of specific mitigation measures incorporated into the Plan, to try and address these issues. Whilst any planning application will need to be accompanied by a HIA at that time, the information in the Council's own HIA should be detailed enough to inform appropriate and specific mitigation measures. How will the harm to these heritage assets be overcome? Specifically, we remain concerned about the impact to Keele Hall Registered Park and Garden. The HIA identifies a medium level of harm but no avoidance or mitigation measures in order to prevent this harm.</p> <p>Additionally, the cumulative impact on these assets is a concern.</p>

<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP546
<b>Order</b>	209
<b>Title</b>	Policy SP23 Land at Cemetery Road / Park Road
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP23
<b>Q6 Details</b>	<p>There is no reference within the HIA regarding the potential impact to the designated heritage assets within the study area, many of which are likely to be affected by other proposed allocations including the heritage assets at Keele Hall RPG, Keele Hall Conservation Area and associated heritage assets. The HIA sets out that there is likely to be a substantial cumulative impact based on the combination of heritage assets and there are no further details or mitigation measures on how to overcome this harm. We consider that the cumulative impacts require further assessment and an understanding if all development proposals can come forward.</p> <p>There are no mitigation measures in the Plan for how any harm to these heritage assets can be avoided.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP547
<b>Order</b>	220
<b>Title</b>	Policy TK6 Site at Coalpit Hill Talke
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK6
<b>Q6 Details</b>	Clause 3 is generic in nature and does not include specific mitigation measures that could have the potential to overcome harm.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP562
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10 Clause 7
<b>Q6 Details</b>	Additional detail should be included about what type of archaeological assessment and issues need to be considered.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>

	Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx
<b>Comment ID</b>	NULLP566
<b>Order</b>	224
<b>Title</b>	Policy TK17 Land off St Martins Road, Talke
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK17 Clause 5
<b>Q6 Details</b>	Add additional detail about the type of archaeological assessment required.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP501
<b>Order</b>	17
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	4.16
<b>Q6 Details</b>	We welcome a specific strategic objective for the historic environment
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP505
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	This clause would benefit from including a reference to heritage assets/ historic environment within the sentence.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP578
<b>Order</b>	240
<b>Title</b>	Policy TC20 King Street Car Park
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy

<b>Q4 Policy</b>	TC20
<b>Q6 Details</b>	We recommend the consideration of cumulative impacts and whether any additional mitigation measures can be identified to overcome the cumulative impact of a number of developments.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP582
<b>Order</b>	248
<b>Title</b>	Policy TC50 Land at Cherry Orchard Car Park, Newcastle
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC50
<b>Q6 Details</b>	<p>Add in details to the policy regarding the potential impact on Grade II* St Giles Church and what mitigation measures are required to overcome the harm.</p> <p>Additional detail is required to be included about a number of heritage assets that could be harmed through this development and incorporate the specific mitigation measures into the Plan.</p> <p>Additionally, consider the cumulative impacts of a number of proposed allocations affecting the same heritage assets, and how this can be overcome.</p>
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP586
<b>Order</b>	169
<b>Title</b>	Keele
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q6 Details</b>	We welcome the HIA set out to evidence the inclusion of proposed allocations within the Plan. In the majority of cases the appropriate mitigation measures are within the HIA; in some cases these have been brought through to the Plan and in others some additional detail is required to ensure that these issues are considered at planning application stage. We remain concerned about the harm to heritage assets Keele Hall Registered Park and Garden, Keele Hall Conservation Area and associated heritage assets, as well as the cumulative impact to these assets through multiple site allocations within a local vicinity
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP513
<b>Order</b>	77
<b>Title</b>	Policy RET2: Shop Fronts, Advertisements, New Signage
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RET 2 Clause 2
<b>Q6 Details</b>	We support having a reference to heritage assets and shop fronts/advertisements within the Plan and consider that this is necessary. However, we consider that the wording is not appropriate in its current format. The wording should refer to heritage assets (designated and non designated) including Conservation Areas and their settings and then set out what is and is not appropriate in the context of

	heritage assets. For example, illuminated signs should be resisted and not carefully considered. Would benefit from including relevant details about shutter types too.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP521
<b>Order</b>	98
<b>Title</b>	Policy IN7 Utilities
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN7 Clause 1e
<b>Q6 Details</b>	A clause ensuring that no harm to the significance of heritage assets and their setting, would be useful here. It may be appropriate to go underground and that may be a better option for a Conservation Area, but this will also need to factor in if there is likely to be below ground archaeology and to ensure that harm is avoided for archaeological remains. Some more considered wording here may help to overcome this issue and we do support the Plan in considering the appropriate placement of utilities infrastructure. Some additional detail in the supporting information section may also be useful.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a>
<b>Comment ID</b>	NULLP525
<b>Order</b>	130
<b>Title</b>	Policy RUR1: Rural Economy
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RUR 1, Clause 2e
<b>Q6 Details</b>	Insert 'appropriate' at the beginning to the sentence to ensure that it is appropriate reuse only that is considered.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP529
<b>Order</b>	138
<b>Title</b>	Policy RUR5: Re-Use of Rural Buildings for Residential Use
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	RUR 5, Clause 1f
<b>Q6 Details</b>	Amend 'sustain' with 'protect' to reflect the National Planning Policy Framework terminology. Remove and their settings from brackets and instead state, 'including their setting'.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP533



Order	170
Title	Policy KL13 Keele Science Park Phase 3
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q4 Part of document	Policy
Q4 Policy	KL13 Clause 6
Q6 Details	We remain concerned about the heritage assets listed including Keele Hall Registered Park and Garden, and associated heritage assets and Keele Hall Conservation Area. The HIA is very limited in detail with regards to the impacts for Keele Hall RPG and the impact of the development on this asset.
Q10 File 1	6387624
Attachments	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
Comment ID	NULLP537
Order	172
Title	Policy KL15 Land South of A525 Keele
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q4 Part of document	Policy
Q4 Policy	KL15 Clause 8
Q6 Details	Support the need for archaeological assessment. Additional detail from the HIA should be included within the clause.
Q10 File 1	6387624
Attachments	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
Comment ID	NULLP541
Order	194
Title	Policy MD29 Land North of Bar Hill, Madeley
Consultee Company / Organisation	Historic England
Consultee Position	Historic Environment Planning Adviser
Consultee Family Name	Taylerson
Consultee Given Name	Kezia
Q4 Part of document	Policy
Q4 Policy	MD29 Clause 11
Q6 Details	There is no impact assessment included within the HIA relating to the heritage assets near and within Madeley Conservation Area and how these may be affected. As such, there are limited mitigation measures for how any harm can be overcome. We consider that this needs to be considered and then specific and relevant mitigation measures incorporated into this clause.  Insert a clause within this policy regarding the need for appropriate archaeological assessment, as the HIA has identified that there is a medium potential for archaeological remains in the area.
Q10 File 1	6387624
Attachments	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
Comment ID	NULLP545
Order	207
Title	Policy SP22 Former Playground off Ash Grove, Silverdale

<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP22 Clause 6
<b>Q6 Details</b>	This clause is welcomed.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>
<b>Comment ID</b>	NULLP549
<b>Order</b>	222
<b>Title</b>	Policy TK10 Land at Crown Bank, Talke and Butt Lane
<b>Consultee Company / Organisation</b>	Historic England
<b>Consultee Position</b>	Historic Environment Planning Adviser
<b>Consultee Family Name</b>	Taylerson
<b>Consultee Given Name</b>	Kezia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TK10 Clause 6
<b>Q6 Details</b>	Additional detail should be incorporated within this clause to set out the specific mitigation measures required.
<b>Q10 File 1</b>	6387624
<b>Attachments</b>	<a href="#">1338871 HE Covering Letter Redacted.pdf</a> <a href="#">Historic England letter re Newcastle under Lyme Local Plan consultation 7 October 2024.docx</a>

<b>Comment ID</b>	NULLP498
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Taylor
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	I am writing to object to the above proposal as this would cause significant damage to our villages eco system, roads and increase pollution. We are a rural community and the access to this site is limited at best. If this were to go ahead it would put added pressure on the roads. Increase the number of patients to doctors overstretched surgeries, as well as more pupils to our already full schools. We want to keep our village rural and not full of houses. We have a lovely stream and wildlife area that's this would destroy.
<b>Comment ID</b>	NULLP907
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Taylor
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	I am writing to object to the above planned policy. My reasons are the infrastructure of the surrounding villages will be very badly effected with the added traffic, noise and pollution. Also our wildlife will suffer as a result of this proposal. Our green Ares will be depleted meaning loss of oxygen from trees, pollination of plants for food and crops. We need to keep out rural areas rural or we risk being a concrete jungle with nothing but factories spewing out more toxins and pollution.

<b>Comment ID</b>	NULLP470
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Thorley
<b>Consultee Given Name</b>	D J
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Agricultural land.</p> <p>We have a government that talks about nett zero and yet we import much of our food from overseas. The Draft Plan is at odds with government policy, which is, that the UK is most reliant on imports of fruit and vegetables, producing 17% and 55% respectively of supply. A significant proportion of UK fresh fruit and vegetable consumption is either exotic or out of season, and supply can be affected where imports are from countries vulnerable to climate change and extreme weather. With this in mind, the UK Government and devolved governments are supporting increased domestic production, particularly of UK fruit and vegetables, to strengthen our food security (Source: UK Food Security Index Updated 11th July 2024). The proposal would remove eighty hectares of of good quality agricultural, greenfield and Green Belt land for twenty-two hectares of low-wage employment land.</p> <p>Congestion.</p> <p>Traffic is already at near breaking point. Junctions 4 to19 are the the busiest of the M6. (Source: Wikipedia)</p> <p>The added complication of the horrendous traffic jams caused when frequent accidents occur between J14 and J16. It regularly affects the A500 and the A34 as well as other minor roads. Traffic regularly tails back from J16 to beyond Peacock's Hay even on normal days, adding an additional access point will further exacerbate an already bad state of affairs.</p> <p>Unemployment.</p> <p>True full employment is an ideal, and probably unachievable, the liklihood in which anyone who is willing and able to work can find a job, and unemployment is zero. It is a theoretical goal for economic policymakers to aim for rather than an actually observed state of the economy. In practical terms, economists can define various levels of full employment that are associated with low, but not zero, rates of unemployment. Unemployment of 5% or lower is often considered full employment in a real-world context. (Source: Investopedia)</p> <p>The UK unemployment rate for the period May-July 2024 was 4.1% (Source: O.N.S.)</p> <p>Newcastle-u-Lyme unemployment rate was 3.1% Dec: 2023 and declining. (Source: O.N.S.). It follows that any increase in employment opportunities would require importing people into the area, thus further increasing traffic, since there is no available public transport. There is already unoccupied warehouse capacity in Alsager (five miles away) as well as Peacock's Hay and Tunstall. Warehouse work is notoriously poorly paid (minimum wage), and would do nothing to change our low-wage economy. Futher suffocating ambition amongst our youth. It is illogical to exacerbate this situation with yet more unnecessary speculative building.</p> <p>I want the Planning Inspector to remove the site from the Local Plan.</p>
<b>Comment ID</b>	NULLP471
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Thorley
<b>Consultee Given Name</b>	D J
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The policy is unsound for the following reasons:</p> <p>Agricultural land.</p> <p>We have a government that talks about nett zero and yet we import much of our food from overseas. The Draft Plan is at odds with government policy, which is, that the UK is most reliant on imports of fruit and vegetables, producing 17% and 55% respectively of supply. A significant proportion of UK fresh fruit and vegetable consumption is either exotic or out of season, and supply can be affected where imports are from countries vulnerable to climate change and extreme weather. With this in mind, the UK Government and devolved governments are supporting increased domestic production, particularly of UK fruit and vegetables, to strengthen our food security (Source: UK Food Security Index Updated 11th July 2024)</p> <p>Congestion.</p>

The roads in this area are already inadequate even on normal days, with regularly slow moving traffic. Cars are routinely illegally parked, on pavements, outside the Londis convenience shop and opposite continuous white lines, on a blind bend, with impunity. Policing this already poor state of affairs is wholly inadequate and will not improve. School buses, public transport buses, heavy wagons, large tractors and SUV's regularly bully their way through our Victorian road system, creating an extremely unsafe environment, especially for our children. We have Ravensmead Primary School in Chapel Street with parents regularly taking them to school in their SUV's, and parking illegally on pavements when they pick them up. If there were an increase in the number of pupils to accommodate new arrivals this situation would, of course, deteriorate further. Adding an additional access point will further exacerbate an already bad state of affairs.

Lack of a suitable infrastructure.

The local primary school is a Victorian building with little room to expand. The access for vehicles to pick up/drop off children safely in a narrow street is severely limited and already represents a significant risk. Nursery places for pre-school children too is limited. Parking for vehicles in modern "rabbit hutch" style housing is already causing problems nationwide with 36% of households having more than one car (Source: National Travel Survey 2020 Gov.UK). This will be further exacerbated if "electrification" increases as currently projected. Opportunities to create additional parking in an area surrounded by Victorian Streets.

I want the Planning Inspector to remove the site from the Local Plan.

<b>Comment ID</b>	NULLP141
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Thorpe
<b>Consultee Given Name</b>	Mike
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP142
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Thorpe
<b>Consultee Given Name</b>	Mike
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>



Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP833
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Thorrington
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I am a resident of Audley, residing at the address above. I am writing with my response to the current local neighbourhood plan for our area.</p> <p>I strongly object to the proposals for Audley parish and consider the plans not to be sound with the inclusion, in particular, of sites AB2, AB2a and AB15.</p> <p><b>Objections to site AB2 and AB2a 'Land at junction 16 of the M6'</b></p> <p>I object to this proposed site as I believe that the economic impact on the local economy would be extremely negative: I believe that developing this land would mean the loss of the best and most versatile agricultural land and would harm local food growing capacity and agricultural employment.</p> <p>I also believe that there would be extremely negative impact on traffic in the area. The site is likely to generate a significant increase in road-based traffic which will negatively impact the rural character of the area and very negatively impact the safety and amenity of rural roads and lanes.</p> <p>I also object on the basis that development of this site would unsustainable and environmentally harmful: there is likely to be biodiversity impact on rural lanes that will need to be widened and range of significant adverse impacts to the area through visual, light and noise disturbances and worsening air quality.</p> <p>I do not believe this proposed site is sound or justified and I would request that it be removed from the local plan.</p>
<b>Comment ID</b>	NULLP834
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Thorrington
<b>Consultee Given Name</b>	Sarah
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p><b>Sarah Thorrington</b></p> <p>(redacted by admin)</p> <p>Dear Planning Policy Team</p> <p>I am a resident of Audley, residing at the address above. I am writing with my response to the current local neighbourhood plan for our area.</p> <p>I strongly object to the proposals for Audley parish and consider the plans not to be sound with the inclusion, in particular, of sites AB2, AB2a and AB15.</p> <p><b>Objections to site AB15 'Land north of Vernon Avenue'</b></p> <p>I object to this proposed site as I believe that there would be extremely negative impact on traffic in the area. The site is likely to generate a significant increase in road-based traffic. I believe this increase will negatively impact the safety of our local roads and will cause higher congestion and more difficulty parking in our already severely congested village.</p> <p>In addition, I object to the development of this site as I believe that 33 more houses will mean an increase in population that would lead to pressure on health, education and other facilities. I do not believe that there is a case to introduce this pressure as our local population has not grown in proportion to the new housing recently completed in the area.</p> <p>I do not believe this proposed site is sound or justified and I would request that it be removed from the local plan.</p>

<b>Comment ID</b>	NULLP827
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Thorrington Wright
<b>Consultee Given Name</b>	Teresa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p><b>Re: Policy AB33 land off Nantwich Road/Park Lane and AB12 and AB15</b></p> <ul style="list-style-type: none"> <li>• My primary objection to the sites chosen for housing – AB33, AB12 and AB15, is that they are on the green belt. I am aware that there are many brownfield sites around the borough, including Audley, that could be cleaned up and developed. I recognise that developers would prefer green belt sites as it makes the project cheaper and faster, but this does not make it right..</li> <li>• Our village infrastructure is not designed nor large enough to take extra traffic from places of work and/or large housing estates. Indeed the current poor state of the road surfaces will only be made worse from increases in traffic volume. There will also be extra demand on village amenities such as schools, shops and GP surgery, which currently are running at very high capacity with seemingly little capability to increase.</li> </ul> <p>I would like to state that I, along with many others, recognise the need for good, low cost housing throughout the borough, and that includes Audley. I believe that we should accommodate new houses, so that younger people who have grown up in this location, together with people who wish to move here, have a chance to own their own their own homes or rent suitable properties in good condition.</p> <p>The proposed changes to our rural village of Audley would seem to fail on many fronts, but the use of green belt and the necessary changes, even if possible, would alter the character and functioning of a small, relatively quiet place.</p> <p>It is for these reasons that we wish the planners to remove sites AB2, AB15, AB12 and AB33 from the local proposal.</p>
<b>Comment ID</b>	NULLP829
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Thorrington Wright
<b>Consultee Given Name</b>	Teresa
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p><b>Re: Policy AB33 land off Nantwich Road/Park Lane and AB12 and AB15</b></p> <ul style="list-style-type: none"> <li>• My primary objection to the sites chosen for housing – AB33, AB12 and AB15, is that they are on the green belt. I am aware that there are many brownfield sites around the borough, including Audley, that could be cleaned up and developed. I recognise that developers would prefer green belt sites as it makes the project cheaper and faster, but this does not make it right..</li> <li>• Our village infrastructure is not designed nor large enough to take extra traffic from places of work and/or large housing estates. Indeed the current poor state of the road surfaces will only be made worse from increases in traffic volume. There will also be extra demand on village amenities such as schools, shops and GP surgery, which currently are running at very high capacity with seemingly little capability to increase.</li> </ul> <p>I would like to state that I, along with many others, recognise the need for good, low cost housing throughout the borough, and that includes Audley. I believe that we should accommodate new houses, so that younger people who have grown up in this location, together with people who wish to move here, have a chance to own their own their own homes or rent suitable properties in good condition.</p> <p>The proposed changes to our rural village of Audley would seem to fail on many fronts, but the use of green belt and the necessary changes, even if possible, would alter the character and functioning of a small, relatively quiet place.</p> <p>It is for these reasons that we wish the planners to remove sites AB2, AB15, AB12 and AB33 from the local proposal.</p>

Comment ID	NULLP825
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Thorrington Wright
Consultee Given Name	Teresa
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Re: Policy AB2 Land at Junction 16 of M6</b></p> <p>When considering the 1 million square metres allocated for a proposed warehouse site, our objections are several;</p> <ul style="list-style-type: none"> <li>• The access is said to be from a new road leading from the A500 just next to the roundabout at Junction 16. However, as local residents are aware, this section of road is more often than not, at a standstill due to traffic volume at most times of the day. At peak times or if there are accidents or breakdowns on the M6, A500 or other adjoining roads, this then becomes lengthy, and this is not uncommon. This will inevitably lead to extra pollution around this area, at a time when most cities are considering traffic reducing measures to reduce pollution due to the affects on health and wellbeing and on local wildlife. Inevitably there will be increased village traffic from local workers travelling from other local villages, and cars trying to avoid being caught up in heavy or stationary traffic at the main junction 16.</li> <li>• It is said to be likely to create jobs for the area, but this would seem to be flawed logic when taking into account that large businesses such as Amazon, are reducing their work forces due to ever increasing mechanisation and the use of artificial intelligence. Also there are still empty warehouses on developments nearby, such as Radway Green, Alsager and Crewe.</li> <li>• Green belt land should not be used and impacted for such a large structure, with the consequences of loss of habitat for wildlife, including buzzards, owls, bats, badgers &amp; foxes which are all regular inhabitants of our locality, to name just a few. The 'Staffordshire wildlife' report submitted on behalf of the local council, reveals this impact in much more detail.</li> <li>• The impact of loss of green spaces, wildlife habitat and the natural environment on our wellbeing and mental health, are all likely to be significant for Audley residents and visitors, who have grown up or even moved here because of these aspects. The green belt land and environment is also there for visitors to our local community, who live in the nearby towns and cities so that they may also enjoy and benefit from the rich and diverse habitat</li> </ul>
Comment ID	NULLP828
Order	151
Title	Policy AB15 Land North of Vernon Avenue
Consultee Family Name	Thorrington Wright
Consultee Given Name	Teresa
Q4 Part of document	Policy
Q4 Policy	AB15
Q6 Details	<p><b>Re: Policy AB33 land off Nantwich Road/Park Lane and AB12 and AB15</b></p> <ul style="list-style-type: none"> <li>• My primary objection to the sites chosen for housing – AB33, AB12 and AB15, is that they are on the green belt. I am aware that there are many brownfield sites around the borough, including Audley, that could be cleaned up and developed. I recognise that developers would prefer green belt sites as it makes the project cheaper and faster, but this does not make it right..</li> <li>• Our village infrastructure is not designed nor large enough to take extra traffic from places of work and/or large housing estates. Indeed the current poor state of the road surfaces will only be made worse from increases in traffic volume. There will also be extra demand on village amenities such as schools, shops and GP surgery, which currently are running at very high capacity with seemingly little capability to increase.</li> </ul> <p>I would like to state that I, along with many others, recognise the need for good, low cost housing throughout the borough, and that includes Audley. I believe that we should accommodate new houses, so that younger people who have grown up in this location, together with people who wish to move here, have a chance to own their own their own homes or rent suitable properties in good condition.</p> <p>The proposed changes to our rural village of Audley would seem to fail on many fronts, but the use of green belt and the necessary changes, even if possible, would alter the character and functioning of a small, relatively quiet place.</p>

It is for these reasons that we wish the planners to remove sites AB2, AB15, AB12 and AB33 from the local proposal.



<b>Comment ID</b>	NULLP167
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Thys
<b>Consultee Given Name</b>	Andrew David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1) Size of the proposed AB2 site has now increased from the original by 40% *22 hectares to *80 hectares (198 acres) of good quality agricultural green belt, surely this can't be effective due to lack good green belt having an impact on farming, wildlife, natural habitat destroying nature, food production.</p> <p>2) Inadequate Access &amp; Exit due to heavy traffic accessing the M6 Motorway network J16 via the A500 (Bottleneck) from both Cheshire and Staffordshire. How can this be realistic? The possibility of workers travelling from further afield via cars, extra HGV'S, service vehicles causing excessive congestion, air pollution, CO2, tyre particulate pollution, noise pollution, - 24/7. Light pollution.</p> <p>3) PROPOSED EMERGENCY POINTS *VIA PARK LANE, unsound planning as this is "narrow" country lane, poor lighting, visibility, overhead cables, no footpaths, very limited (unsuitable) for passing vehicles. Also this emergency exit point could be used as an alternative to queueing on the A500 by employees or even increased congestion through the rural village of Audley trying to get onto the A34*</p> <p>4)The nearest train station would be Alsager, no public services to get to site. If they cycled it would mean navigating once again along poorly lit and very narrow winding country lanes. Imagine that in winter months! Totally unsuitable.</p>
<b>Q7 Modification</b>	<p>1) "Removal of AB2" TOTALLY UNACCEPTABLE SITE OR REDUCE IN SIZE. LOOK FOR ALTERNATIVE SITE ON BROWN BELT</p> <p>2) TO ELIMINATE THE CONGESTION @ J16. NEW INTERSECTION BUILT TO ACCESS THE "PROPOSED" AB2 AT LEAST 3 MILE NORTH SOUTHBOUND ON "BROWN BELT" NOT GOOD QUALITY AGRICULTURAL GREENBELT. *REMOVE THE SITE*</p> <p>3) RECONSIDER EMERGENCY POINTS TO &amp; FROM THE PROPOSED AB2 VIA PARK LANE &amp; BARTHOMLEY ROAD - ALTERNATIVE POINTS. 'REMOVE THE SITE'</p> <p>4) PUT ON PUBLIC TRANSPORT dedicated for workers/ employers to and from the proposed AB2 (using what route?)</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP168
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Thys
<b>Consultee Given Name</b>	Andrew David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1) ACCESS "EARMARKED PRIMARILY VIA "PARK LANE" This is very unrealistic" How can you accommodate access onto a proposed AB33 (55 houses) and maintain unrestricted Access for Emergency vehicles and services on a single track, narrow winding country lane (?) to a proposed "AB2" ACCESS problems would become severe for AB33 if AB2 were passed due to Bottleneck at the top of PARK LANE, NANTWICH ROAD + CHESTER ROAD. There's insufficient infrastructure Roads, pavements, lighting, Additional noise pollution, CO2.</p> <p>2) AB33 SITE - Looking at previous contender site map of local draft plan *this was strong for agricultural green belt land. Questionable as to why they have been proposed (AB33) What agricultural value do they have? (Staffs County Council) There are still cattle grazing here. The field is flooded!! The fact of 55 homes the infrastructure, drainage, lighting, local school (which are full), doctors surgery, dentists, noise pollution of a construction site would greatly effect use. Again access of the proposed AB33 - The council say they have starter forms available yet the bordering AB33 stands empty?</p>
<b>Q7 Modification</b>	<p>1) ACCESSIBILITY ONTO THE ESTATE WOULD NO BE ADEQUATE (VIA THE PRIMARY PROPOSAL OF PARK LANE/ RELOCATE THE PROPOSED AB33 TO AN AREA OF BROWN BELT LAND AS OPPOSED TO GREEN AGRICULTURAL LAND. TO BECOME EFFECTIVE "LARGE" BUDGET ON INFRASTRUCTURE</p> <p>2) RENT OUT STARTER FARMS TO GIVE FAMILIES OPPORTUNITIES TO START A CAREER IN FARMING AND AGRICULTURE - helping with vegetation, wildlife, food chains SURVIVAL!! LIVING OFF THE LAND</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP249
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Tideswell
<b>Consultee Given Name</b>	Katherine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>Dear Planning Team,</p> <p>I am writing to express my concerns about the policy for residential development at Marsh Parade, as outlined in Policy TC22. My primary concern is the lack of robust noise mitigation measures that could severely impact The Rigger, a well-established live music venue that contributes significantly to the cultural fabric of Newcastle-under-Lyme.</p> <p>While Policy TC22 includes a requirement for a noise and odour assessment (found on Page 155), it does not adequately address the specific risks posed to The Rigger, which is located in close proximity to the proposed development. As future residents move into these new dwellings, it is likely that they will file noise complaints against the venue. This could result in severe restrictions on The Rigger's ability to operate, leading to significant consequences for both the business and the local community that relies on it for live music and entertainment.</p> <p>Additionally, the policy does not appear to account for the "Agent of Change" principle as outlined in the National Planning Policy Framework (NPPF). This principle mandates that the developers, not existing businesses, are responsible for mitigating noise issues arising from new residential developments near existing venues. Without proper noise mitigation strategies and the inclusion of this principle in the proposal, The Rigger is at risk of facing unfair noise complaints, which could restrict or even force the venue to close.</p> <p>I urge the planning team to include stronger noise mitigation measures that specifically protect The Rigger. Including specifically mentioning the venues cultural significance and the inclusion of the Agent of Change principle in the 'Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses under Policy TC22 ensuring that the responsibility for mitigating potential noise issues falls on the developers rather than existing businesses and culturally significant venues. Without these changes, The Rigger could face unfair restrictions due to increased noise complaints that would limit its ability to operate and serve the community.</p> <p>Thank you for considering my concerns. I hope the planning team will take the necessary steps to safeguard The Rigger and ensure that it continues to thrive as a vital part of our town's cultural landscape.</p> <p>Kind Regards,</p> <p>Katherine Tideswell</p>

<b>Comment ID</b>	NULLP186
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Tidyman
<b>Consultee Given Name</b>	Janine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP227
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Tidyman
<b>Consultee Given Name</b>	Janine
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p>

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Comment ID</b>	NULLP824
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Timms
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I am writing to register my firm objection to the proposed industrial development at site AB2, located next to Junction 16 of the M6. This site, currently designated as Greenbelt land, should retain its protected status due to the multitude of negative impacts the development would have on both the local environment and the surrounding rural community. I urge the council to reject this proposal based on its direct contravention of the Local Planning Policy and the National Planning Policy Framework (NPPF), which prioritise the protection of Greenbelt land and rural amenities.</p> <p>The site in question was previously deemed unsuitable for development in the former Joint Plan with Stoke-on-Trent Council. The decision by Newcastle Borough Council to pursue the development of this site, after unilaterally withdrawing from the Joint Plan, raises serious concerns about the justification for Greenbelt release. The 'exceptional circumstances' claimed by the council to support the Greenbelt allocation appear unjustified and disproportionate, especially when comparable industrial developments are already underway in nearby Stoke-on-Trent and Cheshire East. Furthermore, the benefits promised by the development are not aligned with the needs of our rural community and do not outweigh the extensive harm it will cause.</p> <p><b>1 Inappropriate Greenbelt Release</b></p> <p>The primary function of Greenbelt land is to prevent urban sprawl, safeguard the countryside from encroachment, and preserve the setting and character of rural communities. The proposed AB2 site serves as a vital buffer between Audley and nearby urban areas, and its development risks irreversible harm to the rural identity of our village. Allowing the removal of Greenbelt status for this development would set a dangerous precedent for further encroachment, contributing to the unchecked spread of industrial development in an otherwise protected area.</p> <p>The NPPF is clear that Greenbelt land should only be released in 'exceptional circumstances,' and I contend that no such circumstances exist here. There is ample evidence that industrial capacity already exists in nearby areas, such as the substantial development at Radway Green, meaning there is no demonstrable need to release Greenbelt land for additional development in Audley.</p> <p><b>1 Environmental and Wildlife Harm</b></p> <p>The environmental impact of this proposed development is extensive and would cause significant harm to local wildlife habitats, air quality, and biodiversity. The AB2 site currently supports a diverse range of flora and fauna, including protected species such as bats, badgers, barn owls, and pollinators like bees and hoverflies. The destruction of this habitat would have a detrimental ripple effect on the wider ecosystem, disrupting food chains and reducing biodiversity.</p> <p>The site's grasslands also play an important role in carbon sequestration, absorbing hundreds of tonnes of carbon dioxide annually. Replacing these grasslands with warehouses and hardstanding would increase carbon emissions and undermine efforts to combat climate change, contradicting both local and national sustainability goals.</p> <p><b>1 Loss of Rural Amenity and Character</b></p> <p>The rural lanes surrounding the proposed site—Park Lane, Moat Lane, and Barthomley Road—are cherished by local residents for walking, cycling, and horse riding. These lanes offer a peaceful escape from urban life and are a crucial part of the area's rural identity. The introduction of a large industrial development would drastically alter the landscape and reduce the quality of life for those living nearby. The scale of the development is disproportionate to the needs of our rural community and would significantly diminish the amenity value of the surrounding countryside.</p> <p><b>1 Increased Traffic and Safety Risks</b></p> <p>The proposed industrial development would lead to a substantial increase in traffic on narrow, single-track lanes that are already ill-suited to handling large volumes of vehicles. Even though the existing lanes, Park Lane, Moat Lane and Barthomley Road are not proposed as official access routes, an increase in unintended vehicle activity, particularly heavy goods vehicles (HGVs) would pose serious safety risks to residents, walkers, cyclists, and horse riders, and create dangerous conditions on local roads. The current road infrastructure is inadequate to support the scale of traffic that this development would generate.</p> <p><b>1 Negative Impact on Air Quality</b></p> <p>The existing grasslands of the AB2 site serve as a natural filter for air pollutants, particularly harmful emissions from the nearby M6 and A500. Replacing this green space with industrial buildings would reduce air quality and pose health risks to local residents, particularly vulnerable groups such as children and the elderly. The potential increase in nitrogen dioxide and PM2.5 particulates from construction and operational traffic is particularly concerning in a rural area that currently enjoys relatively clean air.</p> <p><b>1 Light, Noise, and Dust Pollution</b></p>



	<p>The industrial development would bring increased levels of light, noise, and dust pollution to the area. This would have a disruptive effect on local wildlife, particularly nocturnal species, and would detract from the rural tranquillity that residents currently enjoy. The prolonged construction period, coupled with ongoing operational noise, would create further disturbances for both residents and wildlife. Dust pollution, in particular, poses a health hazard, as it can exacerbate respiratory conditions such as asthma.</p> <p><b>1 Flood Risk</b></p> <p>The site's natural grasslands currently act as a flood management system, allowing rainwater to disperse and absorb naturally. Paving over this land with industrial units and hardstanding would increase surface water runoff, heightening the risk of localised flooding, particularly on Moat Lane, which already experiences regular flooding. This would place additional strain on local drainage systems and could lead to more severe flooding in the future.</p> <p><b>Conclusion</b></p> <p>In light of the significant environmental, social, and economic harm that this development would cause, I respectfully request that Newcastle Borough Council reject the AB2 site allocation and uphold the Greenbelt protection that is so vital to our community. The proposed development contradicts both the principles of sustainable development outlined in the NPPF and the specific strategic objectives of the local planning policy. It is essential that we prioritise the preservation of our rural character, environmental integrity, and community well-being over short-term financial gains.</p>
<b>Q7 Modification</b>	<p>Dramatic reduction in site allocation size from approx 76 hectares to a shared percentage of the 22 hectares required. The use of brownfield sites and redevelopment of existing unused or under-used industrial sites.</p>

<b>Comment ID</b>	NULLP1376
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Tizley
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1432
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Tizley
<b>Consultee Given Name</b>	Angela
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>All very good points in the previous pages particularly in relation to the possible impact on existing properties when disturbing historical mining areas, particularly for us who live (redacted by admin). Also the huge increase in the amount of vehicles in the area if all the developments take place</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP464
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Family Name</b>	Tolley
<b>Consultee Given Name</b>	Chloe
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>I am writing to express my concerns about the policy for residential development at Marsh Parade, as outlined in Policy TC22. My primary concern is the lack of robust noise mitigation measures that could severely impact The Rigger, a well-established live music venue that contributes significantly to the cultural fabric of Newcastle-under-Lyme.</p> <p>While Policy TC22 includes a requirement for a noise and odour assessment (found on Page 155), it does not adequately address the specific risks posed to The Rigger, which is located in close proximity to the proposed development. As future residents move into these new dwellings, it is likely that they will file noise complaints against the venue. This could result in severe restrictions on The Rigger's ability to operate, leading to significant consequences for both the business and the local community that relies on it for live music and entertainment.</p> <p>Additionally, the policy does not appear to account for the "Agent of Change" principle as outlined in the National Planning Policy Framework (NPPF). This principle mandates that the developers, not existing businesses, are responsible for mitigating noise issues arising from new residential developments near existing venues. Without proper noise mitigation strategies and the inclusion of this principle in the proposal, The Rigger is at risk of facing unfair noise complaints, which could restrict or even force the venue to close.</p> <p>As a customer turned employee of The Rigger, I feel incredibly strongly about protecting this vibrant and incredible place that serves as a hub for community, talent and support. The Rigger was my first place of employment and the owners, other staff, and customers have formed a vital part of my life, providing support, laughter, entertainment and education for not only myself, but everyone else who steps through the doors. New talent can showcase their abilities for the first time on the stage, employees can learn new skills- sound technician skills, performing, social media management. I have an incredible amount of brilliant memories that centre around The Rigger and the risk that it could be forced to close is something that would detrimentally affect the local music and hospitality scene, staff and customers alike.</p> <p>I urge the planning team to include stronger noise mitigation measures that specifically protect The Rigger. Including specifically mentioning the venues cultural significance and the inclusion of the Agent of Change principle in the 'Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses' under Policy TC22 ensuring that the responsibility for mitigating potential noise issues falls on the developers rather than existing businesses and culturally significant venues. Without these changes, The Rigger could face unfair restrictions due to increased noise complaints that would limit its ability to operate and serve the community.</p> <p>Thank you for considering my concerns. I hope the planning team will take the necessary steps to safeguard The Rigger and ensure that it continues to thrive as a vital part of our town's cultural landscape.</p>

<b>Comment ID</b>	NULLP327
<b>Order</b>	69
<b>Title</b>	Policy EMP2: Existing Employment Sites
<b>Consultee Family Name</b>	Trading Limited
<b>Consultee Given Name</b>	Tarmac
<b>Agent Family Name</b>	Job
<b>Agent Given Name</b>	Alexander
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	EMP2
<b>Q6 Details</b>	<p>Dear Sir / Madam,</p> <p>Regulation 19 Consultation on the Draft New Local Plan for Newcastle-Under-Lyme Borough Council – Representations on Behalf of Tarmac Trading Limited</p> <p>Introduction</p> <p>Heatons have been instructed by Tarmac Trading Limited ('Tarmac') to prepare and submit representations to the above public consultation for the emerging Newcastle-Under-Lyme Local Plan. The consultation closes 7th October 2024.</p> <p>Tarmac operates a concrete plant in Chesterton. This plant is vital for the importation and production of construction materials for Newcastle-under-Lyme and surrounding areas. The importance of minerals infrastructure such as the plant at Chesterton should be recognised in the emerging Local Plan to safeguard their use, especially from development that could cause conflict in adjoining land use or prejudice future minerals operations.</p> <p>Following a review of the published consultation documents, this letter is Tarmac's formal response to the Final Draft Newcastle-under-Lyme Local Plan. This review focuses on areas of the draft plan which are relevant to Tarmac and their commercial activities at Chesterton, we trust that this representation will positively contribute towards the submission of the Draft Local Plan for examination.</p> <p><b>Tarmac Interests in Newcastle</b></p> <p>Tarmac's Chesterton Concrete Plant is located in Rowhurst Industrial Estate, at the corner of Rowhurst Close and Watermills Road. The site is accessed directly from Watermills Road and is surrounded by other industrial uses, with vacant land opposite and adjacent to the site. The site's address is Tarmac Concrete Plant, Watermills Rd, Chesterton, Stoke-on-Trent, Newcastle, ST5 6BD.</p> <p>The site consists of a concrete batching plant and an aggregate storage building, with conveyors that feed the concrete plant as well as a site office and car park. The site is strategically located for the production and distribution of ready mixed concrete to Newcastle and Stoke.</p> <p><u>Planning Policy and Guidance Context</u></p> <p>National Planning Policy Framework (2023) –</p> <p>Section 17 of the National Planning Policy Framework (NPPF) relates to 'Facilitating the sustainable use of minerals'. Paragraph 215 confirms it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.</p> <p>The NPPF also states that planning policies and decisions should adopt the 'agent of change' principle to safeguard the operation of existing businesses from new development nearby. Paragraph 193 states that:</p> <p>"... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."</p> <p>The onus is therefore placed on new development to account for mitigation and the NPPF is clear that planning policies should reflect this principle.</p> <p>The recent draft version of the NPPF does not propose to remove the agent of change principle.</p> <p>Final Draft Newcastle-under-Lyme Local Plan – Regulation 19 Consultation Version July 2024</p> <p>The Final Draft Newcastle-under-Lyme Local Plan sets out the Council's vision for future development in Newcastle-under-Lyme until 2040. The Draft Local Plan places an emphasis on providing sustainable housing and employment opportunities for the borough.</p> <p>Draft Policy EMP2 'Existing Employment Sites' requires that development proposals adhere to the 'agent of change' principle, ensuring suitable mitigation to protect existing business operations from negative impacts.</p> <p>Draft Policy CT20 allocates 8.88 hectares of land next to Rowhurst Industrial Estate for employment uses, accessible off Watermills Road and therefore adjacent to Tarmac's site. This policy also requires development within the proposed allocation to consider the relationship of the site to surrounding development in line with the agent of change principle.</p> <p>Tarmac welcomes the agent of change principle in Draft Policy CT20 and EMP2 and consider its inclusion necessary to protect important industrial sites such as Chesterton Concrete Plant. The specific reference of and inclusion of the agent of change principle is considered necessary and is consistent with the existing and draft NPPF.</p> <p>Overall, Tarmac welcomes the focus on applying the agent of change principle in the Draft Newcastle-under-Lyme Local Plan – this should be retained in the submission of the Final Local Plan.</p>
<b>Q10 File 1</b>	6386099



<b>Attachments</b>	<a href="#">Tarmac Trading Ltd - Newcastle-Under-Lyme Local Plan Representations 021024.pdf</a>
<b>Comment ID</b>	NULLP328
<b>Order</b>	167
<b>Title</b>	Policy CT20 Rowhurst Close, Chesterton
<b>Consultee Family Name</b>	Trading Limited
<b>Consultee Given Name</b>	Tarmac
<b>Agent Family Name</b>	Job
<b>Agent Given Name</b>	Alexander
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT20
<b>Q6 Details</b>	<p>Dear Sir / Madam,</p> <p>Regulation 19 Consultation on the Draft New Local Plan for Newcastle-Under-Lyme Borough Council – Representations on Behalf of Tarmac Trading Limited</p> <p>Introduction</p> <p>Heatons have been instructed by Tarmac Trading Limited ('Tarmac') to prepare and submit representations to the above public consultation for the emerging Newcastle-Under-Lyme Local Plan. The consultation closes 7th October 2024.</p> <p>Tarmac operates a concrete plant in Chesterton. This plant is vital for the importation and production of construction materials for Newcastle-under-Lyme and surrounding areas. The importance of minerals infrastructure such as the plant at Chesterton should be recognised in the emerging Local Plan to safeguard their use, especially from development that could cause conflict in adjoining land use or prejudice future minerals operations.</p> <p>Following a review of the published consultation documents, this letter is Tarmac's formal response to the Final Draft Newcastle-under-Lyme Local Plan. This review focuses on areas of the draft plan which are relevant to Tarmac and their commercial activities at Chesterton, we trust that this representation will positively contribute towards the submission of the Draft Local Plan for examination.</p> <p><b>Tarmac Interests in Newcastle</b></p> <p>Tarmac's Chesterton Concrete Plant is located in Rowhurst Industrial Estate, at the corner of Rowhurst Close and Watermills Road. The site is accessed directly from Watermills Road and is surrounded by other industrial uses, with vacant land opposite and adjacent to the site. The site's address is Tarmac Concrete Plant, Watermills Rd, Chesterton, Stoke-on-Trent, Newcastle, ST5 6BD.</p> <p>The site consists of a concrete batching plant and an aggregate storage building, with conveyors that feed the concrete plant as well as a site office and car park. The site is strategically located for the production and distribution of ready mixed concrete to Newcastle and Stoke.</p> <p><u>Planning Policy and Guidance Context</u></p> <p>National Planning Policy Framework (2023) –</p> <p>Section 17 of the National Planning Policy Framework (NPPF) relates to 'Facilitating the sustainable use of minerals'. Paragraph 215 confirms it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.</p> <p>The NPPF also states that planning policies and decisions should adopt the 'agent of change' principle to safeguard the operation of existing businesses from new development nearby. Paragraph 193 states that:</p> <p>"... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."</p> <p>The onus is therefore placed on new development to account for mitigation and the NPPF is clear that planning policies should reflect this principle.</p> <p>The recent draft version of the NPPF does not propose to remove the agent of change principle.</p> <p>Final Draft Newcastle-under-Lyme Local Plan – Regulation 19 Consultation Version July 2024</p> <p>The Final Draft Newcastle-under-Lyme Local Plan sets out the Council's vision for future development in Newcastle-under-Lyme until 2040. The Draft Local Plan places an emphasis on providing sustainable housing and employment opportunities for the borough.</p> <p>Draft Policy EMP2 'Existing Employment Sites' requires that development proposals adhere to the 'agent of change' principle, ensuring suitable mitigation to protect existing business operations from negative impacts.</p> <p>Draft Policy CT20 allocates 8.88 hectares of land next to Rowhurst Industrial Estate for employment uses, accessible off Watermills Road and therefore adjacent to Tarmac's site. This policy also requires development within the proposed allocation to consider the relationship of the site to surrounding development in line with the agent of change principle.</p> <p>Tarmac welcomes the agent of change principle in Draft Policy CT20 and EMP2 and consider its inclusion necessary to protect important industrial sites such as Chesterton Concrete Plant. The specific reference of and inclusion of the agent of change principle is considered necessary and is consistent with the existing and draft NPPF.</p> <p>Overall, Tarmac welcomes the focus on applying the agent of change principle in the Draft Newcastle-under-Lyme Local Plan – this should be retained in the submission of the Final Local Plan.</p>
<b>Q10 File 1</b>	6386099
<b>Attachments</b>	<a href="#">Tarmac Trading Ltd - Newcastle-Under-Lyme Local Plan Representations 021024.pdf</a>

<b>Comment ID</b>	NULLP259
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Position</b>	Circus in a Box Cunning Stunts Cabaret
<b>Consultee Family Name</b>	Travis
<b>Consultee Given Name</b>	Eve
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q6 Details</b>	<p>Dear Planning Team,</p> <p>I am writing to express my concerns about the policy for residential development at Marsh Parade, as outlined in Policy TC22. My primary concern is the lack of robust noise mitigation measures that could severely impact The Rigger, a well-established live music venue that contributes significantly to the cultural fabric of Newcastle-under-Lyme.</p> <p>While Policy TC22 includes a requirement for a noise and odour assessment (found on Page 155), it does not adequately address the specific risks posed to The Rigger, which is located in close proximity to the proposed development. As future residents move into these new dwellings, it is likely that they will file noise complaints against the venue. This could result in severe restrictions on The Rigger's ability to operate, leading to significant consequences for both the business and the local community that relies on it for live music and entertainment.</p> <p>Additionally, the policy does not appear to account for the "Agent of Change" principle as outlined in the National Planning Policy Framework (NPPF). This principle mandates that the developers, not existing businesses, are responsible for mitigating noise issues arising from new residential developments near existing venues. Without proper noise mitigation strategies and the inclusion of this principle in the proposal, The Rigger is at risk of facing unfair noise complaints, which could restrict or even force the venue to close.</p> <p>As a local performer and producer of The Rigger, I know firsthand how vital this venue is to the community. Losing it due to increased noise complaints would have a devastating impact on not only my own career but the local economy and creative scene. The Rigger is not only a venue for live music - it serves as a gathering place, a platform for local talent, and a key contributor to Newcastle-under-Lyme's identity as a cultural hub.</p> <p>I urge the planning team to include stronger noise mitigation measures that specifically protect The Rigger. Including specifically mentioning the venues cultural significance and the inclusion of the Agent of Change principle in the 'Noise and odour assessment and mitigation strategy required in relation to nearby commercial uses' under Policy TC22 ensuring that the responsibility for mitigating potential noise issues falls on the developers rather than existing businesses and culturally significant venues. Without these changes, The Rigger could face unfair restrictions due to increased noise complaints that would limit its ability to operate and serve the community.</p> <p>Thank you for considering my concerns. I hope the planning team will take the necessary steps to safeguard The Rigger and ensure that it continues to thrive as a vital part of our town's cultural landscape.</p>

Comment ID	NULLP459
Order	146
Title	Audley
Consultee Family Name	Trenchard
Consultee Given Name	Clare
Q4 Part of document	Paragraph
Q4 Paragraph number	Audley
Q6 Details	<p>I would like to make a representation on the local plan, but acknowledge that it sits slightly outside of the process.</p> <p>Given the proposed developments of AB2 and AB33, which affect my property the most, I would like to suggest that the Green Belt designation is removed from the village of Audley.</p> <p>This would enable existing local residents to develop their own properties.</p> <p>I believe this would go some way towards balancing the needs and interests of developers with those of local residents; making the process of development more fair and equitable.</p>
Comment ID	NULLP835
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Trenchard
Consultee Given Name	Clare
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Re: Final Draft Local Plan – representation</b></p> <p>I am submitting my representation to the Final Draft Local Plan consultation via email as I experienced a delay in receiving an activation code when trying to register to use the online portal.</p> <p>My representation relates to the proposed development of the AB2 site within the Local Plan and whether it is sound.</p> <p><b>Details of why I consider the plan is not sound and the modifications I would like to see made</b></p> <p>Page 109, paragraph 2. States "Safe and convenient access into the development (including for Heavy Goods Vehicles) via a new junction established from the A500 with emergency access via Barthomley Road, both to be delivered in Phase 1 of the development."</p> <p>The developers, Indurent, has published a map on their website which shows an emergency access onto Park Lane (circled in red below, accessed on 7th October 2024, 12.08pm).</p> <p>This discrepancy is significant as it signals an intent from the developers to over-ride what it in the local plan and a failure of the planning process to acknowledge this intent nor to address it. This introduces a lack of confidence in the process.</p>
Q10 File 1	6389331
Attachments	<a href="#">1363811 Clare Trenchard.png</a>
Comment ID	NULLP838
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Trenchard
Consultee Given Name	Clare
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Re: Final Draft Local Plan – representation</b></p> <p>I am submitting my representation to the Final Draft Local Plan consultation via email as I experienced a delay in receiving an activation code when trying to register to use the online portal.</p> <p>My representation relates to the sustainability appraisal in relation to waste and flooding.</p> <p>I live on (Redacted by admin)</p> <p>During the winter months, my cellar floods as does my garden. It is worse when the road junction of Park Lane and Moat Lane is flooded. The photograph below is my garden in February 2024. I would like the local plan to acknowledge the issue with collapsed drains in and around the proposed development sites of AB2 and AB33. I would also like remedial action to said drains to be included in the development proposals.</p>

	The properties that form the boundary of AB2 are not on mains sewerage and my septic tank backs up when the water table is high. Adding neighbouring properties to the waste arrangements for the AB2 site would go some way to compensating for the loss of the green belt.
Q10 File 1	6389333
Attachments	<a href="#">Clare trenchard 3.jpg</a>
Comment ID	NULLP841
Order	147
Title	Policy AB2 'Land at Junction 16 of the M6'
Consultee Family Name	Trenchard
Consultee Given Name	Clare
Q4 Part of document	Policy
Q4 Policy	AB2
Q6 Details	<p><b>Re: Final Draft Local Plan – representation</b></p> <p>I am submitting my representation to the Final Draft Local Plan consultation via email as I experienced a delay in receiving an activation code when trying to register to use the online portal.</p> <p>My representation relates to the proposed AB2 development of the Local Plan and compliance with the duty to co-operate.</p> <p><b>Details of why I consider the plan is not legally compliant with the duty to co-operate and the modifications I would like to see made</b></p> <p><i>AB2 and Stoke-on-Trent City Council</i></p> <p>In line with national policy, all parts of the public sector are moving to a larger planning footprint. For example, with the passing into law of the Health and Care Act 2022, the local health service is now planning on a footprint the size of Staffordshire and Stoke-on-Trent.</p> <p>At a local plan consultation event, I asked about the co-operation with Stoke-on-Trent City Council. I was told there was an agreement that planning targets would not be shared. I believe Staffordshire and Stoke-on-Trent should be considered one place when it comes to identifying land for housing and employment. This would bring into scope brownfield opportunities within the city boundaries.</p> <p>The three images below show the view of the proposed AB2 development site from Moat Lane, the view of a recent warehousing development from Apedale Country Park (at a much greater distance than AB2 will be from Moat Lane) and the view that visitors have from the A500. Derelict warehousing reinforces the view that Stoke-on-Trent is impoverished and does nothing to improve the reputation and standing of the city.</p> <p>I believe brownfield sites should be brought back into use before any Green Belt is developed.</p>
Q10 File 1	6389334
Attachments	<a href="#">Clare trenchard 4 .png</a>
Comment ID	NULLP837
Order	153
Title	Policy AB33 Land off Nantwich Road / Park Lane, Audley
Consultee Family Name	Trenchard
Consultee Given Name	Clare
Q4 Part of document	Policy
Q4 Policy	AB33
Q6 Details	<p><b>Re: Final Draft Local Plan – representation</b></p> <p>I am submitting my representation to the Final Draft Local Plan consultation via email as I experienced a delay in receiving an activation code when trying to register to use the online portal.</p> <p>My representation relates to the proposed development of the AB33 site within the Local Plan and whether it is sound.</p> <p><b>Details of why I consider the plan is not sound and the modifications I would like to see made</b></p> <p>Page 114, point 2. "Primary vehicular access being via Park Lane..."</p> <p>I do not believe the plans for vehicles to exit and enter the site from Park Lane is sound.</p> <p>The lane is narrow and when cars park outside the houses opposite the development site, two cars can not pass.</p> <p>The exit onto Nantwich Road from Park Lane is angled, making a left turn much easier than a right turn. There would need to be an adjustment to this junction to make it safe for an increase in traffic.</p> <p>If cars turn left out of Park Lane and then right at the mini roundabout on to New Road (the main route into Newcastle-under-Lyme), there are often cars parked on the right-hand side. The road is narrow and a car and lorry can not pass at the same time. This often holds up traffic, which backs up to the mini</p>

	roundabout. This congestion with worsen with the proposed housing development. I believe, double yellow lines would need to be introduced.
<b>Q10 File 1</b>	6389332
<b>Attachments</b>	<a href="#">1363811 Clare Trenchard 2.jpg</a>

<b>Comment ID</b>	NULLP85
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Position</b>	Head of Economic Growth and Delivery
<b>Consultee Family Name</b>	Vining
<b>Consultee Given Name</b>	Jonathan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>We support the allocations of sites AB12 and AB33, which are SCC owned land.</p> <p>Please see the attached documents listed below produced during the course of the local plan preparation, which aid in demonstrating the deliverability of the site:</p> <ul style="list-style-type: none"> <li>• Growth Scenarios Report;</li> <li>• Audley and Bignall End Masterplanning Proposals - April 2024</li> </ul>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6381389
<b>Q10 File 2</b>	6381386
<b>Attachments</b>	<a href="#">SFE002 Audley Growth Scenarios Report Aug 2020 Jonathan Vining.pdf</a> <a href="#">SFE004 Audley and Bignall End Masterplanning J Vining.pdf</a>
<b>Comment ID</b>	NULLP84
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Company / Organisation</b>	Staffordshire County Council
<b>Consultee Position</b>	Head of Economic Growth and Delivery
<b>Consultee Family Name</b>	Vining
<b>Consultee Given Name</b>	Jonathan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Legally compliant</b>	Yes
<b>Q5 Sound</b>	Yes
<b>Q5 DTC compliant</b>	Yes
<b>Q6 Details</b>	<p>We support the allocations of sites AB12 and AB33, which are SCC owned land.</p> <p>Please see the attached documents listed below produced during the course of the local plan preparation, which aid in demonstrating the deliverability of the site:</p> <ul style="list-style-type: none"> <li>• Growth Scenarios Report;</li> <li>• Audley and Bignall End Masterplanning Proposals - April 2024</li> </ul>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Q10 File 1</b>	6381389
<b>Q10 File 2</b>	6381386
<b>Attachments</b>	<a href="#">SFE002 Audley Growth Scenarios Report Aug 2020 Jonathan Vining.pdf</a> <a href="#">SFE004 Audley and Bignall End Masterplanning J Vining.pdf</a>



<b>Comment ID</b>	NULLP69
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Wade
<b>Consultee Given Name</b>	Phillip S
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>I refer to the refusal of planning permission Application number: 23/00002/OUT Land off Muckleston Wood Lane and Rock Lane Loggerheads.</p> <ol style="list-style-type: none"> <li>1. The site is not a sustainable location for further residential development by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport opportunities and the need to travel by car to access higher level services. The development would therefore be contrary to Policy SP3 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policy LNPS1 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).</li> <li>2. The proposed development would result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the National Planning Policy Framework (2023).</li> <li>3. The proposed development, by virtue of its position and relationship with White House Farm, would result in less than substantial harm to the setting of this Grade II listed building and this harm is considered to outweigh any public benefits of the proposal. The development is therefore contrary to Policy CSP2 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policy B5 of the Newcastle-under-Lyme Local Plan (2011), Policy LNPP2 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).</li> <li>4. The proposed development would have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. The development is therefore contrary to Policies CSP1 and CSP4 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policies N17 and N19 of the Newcastle under-Lyme Local Plan (2011), Policy LNPP1 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).</li> </ol> <p>Statement as to how the Local Planning Authority has worked in a positive and proactive manner in dealing with the planning application</p> <p>There are fundamental objections to the development which cannot be resolved and therefore the appropriate course of action is to refuse planning permission.</p> <p>Despite receiving over 440 objections to this proposal, your planning department refusing planning permission for this development and the final statement on the refusal stating that there are fundamental objections to the development which cannot be resolved I am surprised and annoyed that this site has been included in the Newcastle under Lyme Local Plan.</p> <p>My objections to this development were sent to you previously and remain and I now comment further as follows:-</p> <p>I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").</p> <p>I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.</p> <p>Summary of Reasons</p> <ol style="list-style-type: none"> <li>1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability: <ol style="list-style-type: none"> <li>a) The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.</li> <li>b) The Council has already determined that this site is not within a sustainable location</li> <li>c) The inclusion of this site for housing development contravenes the NPPF 2023.</li> <li>d) The Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".</li> <li>e) The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicles due to the lack of poor public transport and access to higher leisure/retail services.</li> <li>f) In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.</li> </ol> </li> </ol>

	<p>2. LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023).</p> <p>This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.</p> <p>The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.</p> <p>3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023).</p> <p>This harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023).</p> <p>This was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.</p> <p>5. Policy PSD3: Distribution of Development (page 16)</p> <p>a) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.</p> <p>b) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided.</p> <p>c) Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.</p> <p>In Conclusion, for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Q7 Modification</b>	<p>In Conclusion, for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023.</p> <p>7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.</p>
<b>Comment ID</b>	NULLP68
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Wade
<b>Consultee Given Name</b>	Phillip S
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>I refer to the refusal of planning permission Application number: 23/00002/OUT Land off Muckleston Wood Lane and Rock Lane Loggerheads.</p> <p>1. The site is not a sustainable location for further residential development by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport opportunities and the need to travel by car to access higher level services. The development would therefore be contrary to Policy SP3 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policy LNPS1 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).</p> <p>2. The proposed development would result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the National Planning Policy Framework (2023).</p> <p>3. The proposed development, by virtue of its position and relationship with White House Farm, would result in less than substantial harm to the setting of this Grade II listed building and this harm is considered to outweigh any public benefits of the proposal. The development is therefore contrary to Policy CSP2 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policy B5 of the Newcastle-under-Lyme Local Plan (2011), Policy LNPP2 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).</p> <p>4. The proposed development would have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. The development is therefore contrary to Policies CSP1 and CSP4 of the Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy (2006-2026), Policies N17 and N19 of the Newcastle under-Lyme Local</p>

Plan (2011), Policy LNPP1 of the Loggerheads Neighbourhood Plan and the aims and objectives of the National Planning Policy Framework (2023).

Statement as to how the Local Planning Authority has worked in a positive and proactive manner in dealing with the planning application

There are fundamental objections to the development which cannot be resolved and therefore the appropriate course of action is to refuse planning permission.

Despite receiving over 440 objections to this proposal, your planning department refusing planning permission for this development and the final statement on the refusal stating that there are fundamental objections to the development which cannot be resolved I am surprised and annoyed that this site has been included in the Newcastle under Lyme Local Plan.

My objections to this development were sent to you previously and remain and I now comment further as follows:-

I consider that the draft plan is not sound, in particular, with reference to page 129 namely "Policy LW53 Land at Corner of Muckleston Wood Lane, Loggerheads". This is because the allocation of site LW53 for future housing development is contrary to and inconsistent with current national policy namely, the National Planning Policy Framework 2023 ("the NPPF 2023").

I also challenge the soundness of the draft local plan with regard to "Policy PSD3: Distribution of Development" (page 16 of the draft plan) in that the numbers within this Policy have not been justified.

#### Summary of Reasons

1. LW53 is not a "sustainable location" for future housing development and is therefore contrary to national policy. This view was endorsed by the Council's Planning Committee on the 27th February 2024, who refused outline planning permission for the development of housing on this same site for the following reason regarding sustainability:

- a) The site is not considered to be a sustainable location by virtue of the lack of supporting infrastructure available locally to support the development, limited public transport facilities and the need to travel by car to access higher level services.
- b) The Council has already determined that this site is not within a sustainable location
- c) The inclusion of this site for housing development contravenes the NPPF 2023.
- d) The Council's own evidence document namely, the "Rural Area Topic Paper" (June 2021 topic paper-paragraph 124) notes the following: "Loggerheads - G.P access is dependent on travel to Ashley and does not have a direct bus service to the hospital. Loggerheads is the least accessible to jobs by public transport (to Newcastle-under-Lyme) Loggerheads has very mixed accessibility in terms of travel times to services and facilities".
- e) The above text and the recent refusal of this site for housing development supports the view that it is not a sustainable location and development will only encourage reliance on private motor vehicles due to the lack of poor public transport and access to higher leisure/retail services.
- f) In conclusion, LW53 is not considered to be a site within a sustainable location and is contrary to the NPPF 2023.

2. LW53 is currently in use as agricultural farmland and consists of best and most versatile agricultural land. The UI proposed development would therefore result in the loss of best and most versatile agricultural land contrary to Paragraph 180 of the NPPF (2023).

This point was recognised by the Council's Planning Committee and was one of the reasons for the refusal of housing on this site.

The selection of this green field site for housing is also contrary to the underlying national policy principle of prioritising brownfield and other under-utilised urban sites.

3. LW53 is adjacent to the Grade II listed building of White House Farm. The recent planning application for this site recognised that the proposed development of the site for housing would result in harm to the setting of this Grade II listed building. As the listed building will remain, any future development would inevitably result in harm to this heritage asset and would be contrary to the aims and objectives of the NPPF (2023).

This harm was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.

4. The inclusion of LW53 for residential development will have an adverse impact on the character and appearance of the open countryside and the rural setting and character of this part of Muckleston Wood Lane. This would be in contradiction of the aims and objectives of the National Planning Policy Framework (2023).

This was recognised by the Council's Planning Committee as part of the reasoning for the refusal of housing on this site.

#### 5. Policy PSD3: Distribution of Development (page 16)

- a) No figures/evidence has been provided to justify why it is considered necessary for Loggerheads to expand by 450 dwellings. The proposed expansion figure should be compared to other rural centres where dwellings in the region of 250 is suggested. Given the Council's own evidence regarding the accessibility of Loggerheads being mixed, no justification has been provided for such a large increase.
- b) The draft local plan also suggests that this number of dwellings are required to meet the development proposals of Loggerheads. Again, no justification is given for this statement (page 127 of the draft plan). Although, current on-going developments are part of the proposed increase, no account has been taken of the current variety of housing (including affordable, single housing and bungalows) already being provided.
- c) Planning Policy Officers merely say that "the Borough has a need for x amount of housing and Loggerheads has to have its share". Yet no justification has been provided for the proposed 450 dwelling increase for Loggerheads when comparing with the proposed smaller increases for the other rural centres.

In Conclusion, for the draft local plan to pass the test of "soundness", the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning

	Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.
<b>Q7 Modification</b>	In Conclusion, for the draft local plan to pass the test of “soundness”, the allocation of LW53 should be removed as a preferred site for future housing. This site, as acknowledged by the Council's Planning Committee, is not a sustainable location and for the other reasons (above) is contrary to the NPPF 2023. 7(ii) The reference to the increase of 450 dwellings should be removed from the draft plan.

<b>Comment ID</b>	NULLP1221
<b>Order</b>	1
<b>Title</b>	Foreword
<b>Consultee Family Name</b>	Walker
<b>Consultee Given Name</b>	Robert
<b>Q6 Details</b>	No to local planning policy
<b>Comment ID</b>	NULLP1144
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Walker
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy AB2 is unsound as the warehouses and employment site will never be used as is the case with large parts of Newcastle-under-lyme and recently Alsager, where warehouses and employment buildings stand empty. This is a purely an illogical approach as in the present and foreseeable future businesses are shutting down due to the economical recession. My suggestion would be to reduce AB2 considerably by not building an employment zone or warehouses.</p> <p>Policy AB15 is unsound as creating new unaffordable houses (government and many councils are delusional in thinking builders will sell their properties at anything less than the area asking prices) will create more traffic problems increase stress on the infrastructure ie schools, hospitals, power, sewage which are already overstretched. My suggestion would be to halve the amount of houses to 16.</p> <p>Policy AB33 the same comment as for policy AB15 with the same suggestion reducing the houses by half to 27.</p>
<b>Q7 Modification</b>	<p>AB2 just build the lorry park I guarantee the warehouses and employment buildings will remain empty for at least 10 to 20 years.</p> <p>AB15 reduce the houses by half to 16.</p> <p>AB33 reduce the houses by half to 27.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1145
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Walker
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy AB2 is unsound as the warehouses and employment site will never be used as is the case with large parts of Newcastle-under-lyme and recently Alsager, where warehouses and employment buildings stand empty. This is a purely an illogical approach as in the present and foreseeable future businesses are shutting down due to the economical recession. My suggestion would be to reduce AB2 considerably by not building an employment zone or warehouses.</p> <p>Policy AB15 is unsound as creating new unaffordable houses (government and many councils are delusional in thinking builders will sell their properties at anything less than the area asking prices) will create more traffic problems increase stress on the infrastructure ie schools, hospitals, power, sewage which are already overstretched. My suggestion would be to halve the amount of houses to 16.</p> <p>Policy AB33 the same comment as for policy AB15 with the same suggestion reducing the houses by half to 27.</p>

<b>Q7 Modification</b>	AB2 just build the lorry park I guarantee the warehouses and employment buildings will remain empty for at least 10 to 20 years. AB15 reduce the houses by half to 16. AB33 reduce the houses by half to 27.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP1146
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Walker
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Policy AB2 is unsound as the warehouses and employment site will never be used as is the case with large parts of Newcastle-under-lyme and recently Alsager, where warehouses and employment buildings stand empty. This is a purely an illogical approach as in the present and foreseeable future businesses are shutting down due to the economical recession. My suggestion would be to reduce AB2 considerably by not building an employment zone or warehouses.</p> <p>Policy AB15 is unsound as creating new unaffordable houses (government and many councils are delusional in thinking builders will sell their properties at anything less than the area asking prices) will create more traffic problems increase stress on the infrastructure ie schools, hospitals, power, sewage which are already overstretched. My suggestion would be to halve the amount of houses to 16.</p> <p>Policy AB33 the same comment as for policy AB15 with the same suggestion reducing the houses by half to 27.</p>
<b>Q7 Modification</b>	AB2 just build the lorry park I guarantee the warehouses and employment buildings will remain empty for at least 10 to 20 years. AB15 reduce the houses by half to 16. AB33 reduce the houses by half to 27.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



<b>Comment ID</b>	NULLP1351
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Walsh
<b>Consultee Given Name</b>	George
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1408
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Walsh
<b>Consultee Given Name</b>	George
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b></p> <ul style="list-style-type: none"> <li>- Damage to the environment will be irreparable</li> <li>- Possible damage to some of the older houses due to pile driving</li> <li>- The roads in Redt St will not be able to cope with the huge increase of traffic and subsequent pollution</li> <li>- Pollution from building machinery</li> <li>- Too many parts of the country are being turned into an urban jungle with urban sprawl and increasing connection of seperate communities</li> <li>- To build on this land is asking for drainage problems in the future- this is a very high point in North Staffs</li> <li>- Some of the proposed land for the building is riddled with mine shafts</li> <li>- More development will destroy what is left</li> </ul>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1339
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Warburton
<b>Consultee Given Name</b>	Leon
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>Issues with AB15 and Access to Vernon Avenue:</p> <p>The proposed AB15 development will also have a detrimental impact on traffic and road safety, particularly with the access onto Church Street from Vernon Avenue. This area is already prone to congestion, and the development will further strain the local road network, increasing the likelihood of serious road traffic accidents. The local infrastructure is simply not designed to handle such a significant increase in traffic volume.</p>
<b>Comment ID</b>	NULLP1338
<b>Order</b>	146
<b>Title</b>	Audley
<b>Consultee Family Name</b>	Warburton
<b>Consultee Given Name</b>	Leon
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>I am writing to express my strong objection to the proposed developments in Audley Parish of the due to the severe traffic, safety, and environmental issues it will create for the surrounding communities, as well as the strain it will place on essential services.</p> <p><b>Traffic and Road Safety Concerns:</b></p> <p>The A500 is already heavily congested, particularly during peak hours, and the addition of another estimated 400–500 vehicles will lead to frequent gridlock. This road is vital for local and regional travel, and the increased volume from the warehouse will have a detrimental effect on traffic flow, potentially leading to severe delays and accidents.</p> <p>There is no direct access from the A500 to Park Lane, meaning much of the new traffic will inevitably be diverted onto smaller, rural roads. These roads were originally constructed for farm use and remain narrow, single-track lanes without footpaths, which makes them unsuitable for the significant increase in vehicular traffic. The constant presence of agricultural vehicles already makes these roads hazardous for pedestrians and smaller vehicles, and an influx of over 400 vehicles will only exacerbate the danger. This situation presents a serious risk of accidents, particularly in the nearby villages such as Audley, Bignall End, Red Street, Chesterton, and Halmerend.</p> <p><b>Environmental Impact:</b></p> <p>The environmental implications of this project are concerning. The increase in traffic will lead to higher levels of air and noise pollution, affecting the quality of life for local residents and damaging the surrounding flora and fauna. Additionally, the construction of the warehouse itself, and the subsequent increase in traffic, will disturb natural habitats and contribute to the loss of biodiversity in the area. The environmental footprint of this development is not justified and must be carefully reconsidered.</p> <p><b>Issues with AB15 and Access to Vernon Avenue:</b></p> <p>The proposed AB15 development will also have a detrimental impact on traffic and road safety, particularly with the access onto Church Street from Vernon Avenue. This area is already prone to congestion, and the development will further strain the local road network, increasing the likelihood of serious road traffic accidents. The local infrastructure is simply not designed to handle such a significant increase in traffic volume.</p>

<b>Comment ID</b>	NULLP56
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Watts
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I recogniase the need for the additional housing in the parish of Audley and have no objection to those proposals. My concern and objection lies with the AB2 warehousing proposals adjacent to the M6.</p> <p>In addition to taking valuable green space the increase in traffic in the area, particularly when the main arterial roads are blocked, which is frequent, is one of my reasons for objecting. The village roads and minor roads connecting the outling areas are likely to be used both as a rat run and a relief road if the need arises.</p> <p>I am also concerned that Junction 16 of the M6, already extremely busy and congested at peak times, will become even more problematic with the increase in traffic from the proposed AB2 site. The provision of another entrance/exit to the junction should this be part of the plan, will only add to this.</p>
<b>Q7 Modification</b>	Remove size of AB2 plan or remove completely.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP995
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Webb
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>In respect of the above I have the following comments as to why the proposed sites within the Audley Rural Parish are not viable, and please note this is a rural parish, which would not be the case anymore if any of the proposed sites are allowed!</p> <p>AB12</p> <p>This really is a ridiculous site! The proposed access is on bend where parked cars are either side of the road, and people driving up and down have to give way and pull in to let traffic past, and the access from Diglake Street isn't viable either because of the on street parking for the current residents of Diglake Street. This makes the proposal unsound, and that is before we look at the actual site which is green belt land with any development of that land having a potential impact not only on infrastructure, which is currently at breaking point with no proposals for improvement, but also on an environmental aspect. There is a small stream to the site, development could lead to flooding, the area has been used, as are neighbouring fields, for farming, so would take away from food contributions locally. I know some of the local residents undertook a traffic survey and would question have the authority, as if they had then they would know the issues that there are now, nevermind if 125 houses were added.</p> <p>I would question the Councils decision making if they consider any of the above sites to be justifiable and all of them to be unsound with very little consideration given to the community and residents of Audley and Bignall End. Whilst I accept that there has to be a need for housing and industry they need to be built in areas that can cope with all that they bring with infrastructure already in place, the infrastructure is not something that can be added at a later date! At the start of my email I mentioned this is a Rural Parish, and that is what it should remain. The surrounding country side and the sites themselves are of benefit to the local ecology and as such is as valuable as any housing or warehousing would be.</p>
<b>Comment ID</b>	NULLP994
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Webb
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>In respect of the above I have the following comments as to why the proposed sites within the Audley Rural Parish are not viable, and please note this is a rural parish, which would not be the case anymore if any of the proposed sites are allowed!!</p> <p>AB2</p> <p>This site is now increased from the initial 69 acres, an increase despite of mass local opposition! How can this be justified? The proposed 80 hectare site is as big as the Audley and Bignall End and would have a huge impact on the local area. Apparently within the Local Plan the Borough Council have stated that they require an area the equivalent 20 hectares of strategic employment land, and there must be other sites within the borough that offer this, and so my question is why are they looking at 80 hectares here? Four times that which they state is required!! Furthermore what consideration has been given to the existing warehousing facilities within the local area, some of which is no doubt unoccupied. The development at AB 2 if allowed would surely mean some of the already built and occupied units would lost their tenants and people move and relocate to new premises, leaving current warehousing empty, potentially causing hardship for owners of those warehouses.</p> <p>Then we have to consider the access to the site and the mass increase in traffic that a site of that size would bring. Not all of the traffic heading to the site would be approaching it from the A500 and M6, there are many roads around the area, mostly country lanes and they are not equipped for any more traffic than currently uses them. I understand that the Borough Council would need assistance from Highways England, however this can be said of any Local Authority in the country and with the National Government currently stating that there is a £22 billion shortfall then assistance would not be forthcoming, especially given that this is an area that has been overlooked massively by the National Government and so our local authority cannot realistically believe that they would get some form of national assistance for roads and improvements that would be needed for such a massive project.</p> <p>Finally the decision to abandon HS2 will have had an impact on this as potential industry that would have considered relocating due to new and improved rail links is not happening any more.</p>



	<p>I would question the Councils decision making if they consider any of the above sites to be justifiable and all of them to be unsound with very little consideration given to the community and residents of Audley and Bignall End. Whilst I accept that there has to be a need for housing and industry they need to be built in areas that can cope with all that they bring with infrastructure already in place, the infrastructure is not something that can be added at a later date! At the start of my email I mentioned this is a Rural Parish, and that is what it should remain. The surrounding country side and the sites themselves are of benefit to the local ecology and as such is as valuable as any housing or warehousing would be.</p>
<b>Comment ID</b>	NULLP997
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Webb
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>In respect of the above I have the following comments as to why the proposed sites within the Audley Rural Parish are not viable, and please note this is a rural parish, which would not be the case anymore if any of the proposed sites are allowed!!</p> <p>AB33</p> <p>This site is the least inoffensive, though the same issues arise in respect of the local road infrastructure, as with the other sites proposed this is also on greenbelt land! The addition of even 55 houses adds significantly to the traffic flow, the roads are not adequate for the increase.</p> <p>I would question the Councils decision making if they consider any of the above sites to be justifiable and all of them to be unsound with very little consideration given to the community and residents of Audley and Bignall End. Whilst I accept that there has to be a need for housing and industry they need to be built in areas that can cope with all that they bring with infrastructure already in place, the infrastructure is not something that can be added at a later date! At the start of my email I mentioned this is a Rural Parish, and that is what it should remain. The surrounding country side and the sites themselves are of benefit to the local ecology and as such is as valuable as any housing or warehousing would be.</p>
<b>Comment ID</b>	NULLP996
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Webb
<b>Consultee Given Name</b>	Daniel
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>In respect of the above I have the following comments as to why the proposed sites within the Audley Rural Parish are not viable, and please note this is a rural parish, which would not be the case anymore if any of the proposed sites are allowed!</p> <p>AB15</p> <p>Simply put there is no way that this should be allowed. The narrow roads and volume of traffic in this area and the village itself would not cope with even this small number of houses. The on road parking make driving round this area difficult now, and the volume of vehicles even without new housing seems to increase year on year. Most families in this area have two or three cars, a lot of the houses in the main village are terraced with no driveway parking and people use those roads for access which causes big traffic issues.</p> <p>I would question the Councils decision making if they consider any of the above sites to be justifiable and all of them to be unsound with very little consideration given to the community and residents of Audley and Bignall End. Whilst I accept that there has to be a need for housing and industry they need to be built in areas that can cope with all that they bring with infrastructure already in place, the infrastructure is not something that can be added at a later date! At the start of my email I mentioned this is a Rural Parish, and that is what it should remain. The surrounding country side and the sites themselves are of benefit to the local ecology and as such is as valuable as any housing or warehousing would be.</p>

<b>Comment ID</b>	NULLP169
<b>Order</b>	194
<b>Title</b>	Policy MD29 Land North of Bar Hill, Madeley
<b>Consultee Family Name</b>	Wedgwood
<b>Consultee Given Name</b>	Jodie
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	MD29
<b>Q6 Details</b>	<p>Dear Sir / Madam,</p> <p>I am emailing to object to the proposed local plan using greenbelt for housing, in particular the land off Bar Hill in Madeley - M29 on the site allocation maps.</p> <p>I have read the local plan documents and attended the consultation event in Madeley.</p> <p>I appreciate there is a need to provide housing for the future generations. However I strongly believe this site is unsuitable for a number of reasons and should therefore be taken out of the local plan.</p> <p>I know the National Planning Policy Framework states that greenbelt land is designated to prevent urban sprawl so the character of the countryside is maintained and that development of such land should only be permitted in exceptional circumstances.</p> <p>The land off Bar Hill is unsuitable because ...</p> <p>*Yet again as I type this email the road at the bottom of Bar Hill is flooded. This happens numerous times a year and if houses are built on the land the water which already sinks into the soil will have nowhere to go - making the problem even worse. The road was cut off for weeks last year and caused major problems in the area.</p> <p>*The road is already extremely busy with traffic - both commuter and agricultural traffic and there have been numerous incidents where cars have been written off (my daughter's parked car was smashed into) and damaged due to the amount of traffic on that road and the speed at which they travel. Adding hundreds more houses will only make this matter worse and the road where the development entrance will be is a blind bend- so it's an accident waiting to happen.</p> <p>*It is also an area for wildlife and biodiversity- particularly bats.</p> <p>*The local village amenities are already over stretched and over subscribed. Bringing hundreds more people into the village will put extra pressure on the schools and GP surgery.</p> <p>In conclusion I believe the proposed development off Bar Hill in Madeley would have a significant detrimental impact on the community and the local environment. The extra homes and commuters will increase pollution and put a strain on the local infrastructure.</p> <p>I strongly urge you to look again at where you are going to allow housing to be built and explore other areas which are brownbelt which would enable the revitalisation of the town, instead of building on greenbelt and ruining the countryside and the environment.</p> <p>Yours faithfully,</p> <p>Jodie Wedgwood</p>

<b>Comment ID</b>	NULLP1257
<b>Order</b>	216
<b>Title</b>	Policy BL18 Land at Clough Hall
<b>Consultee Family Name</b>	Wells
<b>Consultee Given Name</b>	Rebecca
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	BL18
<b>Q6 Details</b>	<p>I am writing to express that I fully and wholeheartedly oppose all plans to develop our rare and precious green spaces into housing estates, but particularly wish to focus on Barnet's field (referred to as "Land at Clough Hall" on the local plan) in my objection. The green spaces in our city are already few and far between, and require our protection and support to thrive, not erasure from existence.</p> <p>I use and appreciate Barnet's field on a daily basis and would be utterly bereft if it were gone. It was my sanctuary growing up on (redacted by admin) as a child, a haven which taught me a deep appreciation for nature and wildlife which has carried on into my adult years. Now I live on (redacted by admin), I visit this oasis daily to walk with my dog, and I never fail to come across at least one other person utilizing and enjoying this space. On my walks in the field, I have seen abundant flora and fauna, many of whom are rare species, which I have been documenting as I fear so much for the future of this habitat oasis. I am happy to provide a list and photos of these. There are native wild orchids, birds, invertebrates, wildlife and fungi who share this habitat with us, and call it their home. In a world which is becoming severely more nature-depleted by the day, I beg you to reconsider your decision to destroy this beautiful place when we desperately need to conserve what little natural and rewilded spaces we have left for the benefit of all our futures. The UK is one of the most nature-depleted countries in the world, and nature is still declining rapidly. See <a href="https://stateofnature.org.uk/">https://stateofnature.org.uk/</a></p> <p><a href="https://naturalengland.blog.gov.uk/2023/09/29/state-of-nature/">https://naturalengland.blog.gov.uk/2023/09/29/state-of-nature/</a></p> <p>Newcastle-under-Lyme borough council could be leading the way by protecting these much needed areas, setting a precedent for the rest of the UK to follow suit. A u-turn on this plan could be an opportunity to loudly declare your dedication to saving the little nature we have left. With no exaggeration, I have noticed far more butterflies congregated here than anywhere else I visit, and I visit many national parks, nature reserves etc. for walks every weekend. I have taken videos showing this, because it amazes me so much. Butterfly Conservation recently declared that there is a "Butterfly emergency" - <a href="https://butterfly-conservation.org/news-and-blog/uk-butterfly-emergency-declared">https://butterfly-conservation.org/news-and-blog/uk-butterfly-emergency-declared</a> - and in light of this, surely protecting such an abundant habitat for them is extremely important.</p> <p>Almost every day I see children out using and appreciating the field, playing with friends and gaining an appreciation for outdoor spaces which so many young people heartbreakingly do not have the opportunity to any more. As the age-old saying goes, children are our future, and the more of them who can gain an appreciation for nature, the better for the survival of our planet as a whole.</p> <p>The huge, established mature trees surrounding the plot are a credit to the area, a beautiful spectacle which are treasured and appreciated by many neighbours and visitors to the area. So many people comment and compliment how beautiful they make driving into Talke and the surrounding area, they are an asset to the community not to mention habitats for thousands of species - each tree is a dynamic ecosystem which supports upwards of 2,300 species. Some studies even suggest the figure is more like 2.3 million - see <a href="https://tree.opentreeoflife.org/about/synthesis-release/v14.9">https://tree.opentreeoflife.org/about/synthesis-release/v14.9</a></p> <p>The younger oak trees on the field were I believe planted by schoolchildren as a part of a project to help renature the area and they are absolutely thriving and happy, they have been an absolute joy to watch grow and mature over the years and it sickens me to the core to think they are under threat of being bulldozed to create housing on what is clearly highly unsuitable land. It is notable that oak trees support more wildlife than any other species of tree, making these even more of a valuable and important asset to the area.</p> <p>The land itself is extremely boggy, particularly in the colder months, something which has over the years become worse and worse with the removal of surrounding trees on higher land beside the field. You cannot walk across the field without wellingtons or sturdy boots after rainfall, it has made it the perfect habitat for bog plants such as the orchids I mentioned before, but surely renders it absolutely useless as a building plot.</p> <p>The neighbours of the field have embraced having a natural beauty spot on their doorstep, some creating beautiful house extensions with balconies and garden buildings optimized to enjoy the tranquility and views provided by this habitat. Many moved to the surrounding houses because of the natural surroundings, with the beautiful trees and walks so nearby, and the nature they attract. Please think about the wellbeing these current constituents, many of whom have lived there for decades, and consider how this development would affect them. Although I object on a moral and environmental level, the development would surely devalue these surrounding properties, too.</p> <p>The A34 is congested at the best of times already, living on (redacted by admin) I use it daily to commute to work and have to leave much earlier to accommodate for the excess traffic which already uses the road to enable me to get to work on time. Adding more housing and therefore more people and cars will create further congestion in the area and therefore pollution and local upset.</p> <p>I feel I could write for months and still not be able to express or include every detail about why locally, environmentally and personally these green spaces mean so much. There are so many brownfield sites in our area, derelict buildings, abandoned projects, and so on, which would be better repurposed for housing, and I cannot understand why our green spaces are being targeted before these. Derelict</p>

buildings and wasteland detract massively from our area, whereas green spaces enhance them enormously. Enough has already been taken from nature; regenerate old sites and let the wild be wild.

<b>Comment ID</b>	NULLP70
<b>Order</b>	242
<b>Title</b>	Policy TC22 Marsh Parade, Newcastle (Former Zanzibar Night Club)
<b>Consultee Company / Organisation</b>	The Rigger
<b>Consultee Position</b>	Director
<b>Consultee Family Name</b>	Wergason
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	TC22
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	Being the [reacted by admin] of a music venue that sits opposite to the proposed development, my concerns are the possibility that the residential development may affect and limit the way in which we can operate. I would like to submit paragraph 103 Chapter 15 of the National Planning Policy Framework 'conserving and enhancing the natural environment' specifically: planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of workshop, pubs, <u>music venues</u> and sports clubs). Our concern is that development may commence without consideration of the above.
<b>Q7 Modification</b>	We hope that mitigations are considered within the planning proposals that are sympathetic to the pre-existing surrounding businesses. Any aspect of the residential element that faces the takeaways, public houses and music venues should consider that these are contributing to the night time economy until the early hours of the morning, traffic and pedestrian footfall being part of this. Substantial sound proofing and positioning of any balconies in the proposal would be beneficial to a mutual co-existence. If this cannot be accommodated, i would have to oppose the development on the grounds stated in part 6 of the representation form.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	As a local business and resident, any proposals will have a big impact. I believe any proposal has to consider the pre-existing community and think that i am in a unique position to comment on this.

<b>Comment ID</b>	NULLP239
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Family Name</b>	Whally
<b>Consultee Given Name</b>	Tracy
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q6 Details</b>	<p>Dear Borough Council,</p> <p>I am writing to express my concerns regarding the plan within Silverdale Parish - Keele golf course. You are proposing a country park? I wish to express my deepest concern that we currently have a vast amount of wildlife, birdlife, flora and fauna on this site which you are proposing to build on. I walk across this whole area on a daily basis in all 4 seasons and i assume that the persons who have offered up this land do not.</p> <p>This land was left to the people of Silverdale and Keele for recreational use and i am unsure how the Council can ride roughshod over the people of the Parish, whilst insulting them by dangling a 'carrot' of a country park.</p> <p>Silverdale and Keele have offered up a large percentage of land during the past 15 years and wildlife, environment can no longer survive.</p> <p>It is quite easy to see that the natural springs appear when we have rain now on this site. Take a walk down Pepper St to see the torrents of water now flooding the road from run off near that building site. The proposed roads offer a rat run between Silverdale and the A525 and extra traffic will create problems withing the village not to mention the poor residents on Staveley Close.</p> <p>How can we install solar farms in the name of climate change whilst destroying an environment that supports a vast array of wildlife?</p> <p>I spend an hour or more a day walking this area and think that the plan is nothing short of criminal. There are plenty of brownfield sites in this ancient historical Borough. We should preserve and respect what we have.</p>



<b>Comment ID</b>	NULLP1138
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Whitney
<b>Consultee Given Name</b>	Claire
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p>GREEN BETL VIOLATION</p> <p>a) There are brownfield site(s) adjacent to the A500 near Stoke-on-Trent with good vehicular access</p> <p>b) This would save valuable green land which should be protected</p> <p>c) The plan mentioned that green belt boundaries will be strengthened. This plan disregards existing boundaries.</p> <p><u>Employment gain for N/C</u></p> <p>This is minimal as the AB2 site is readily accessible from <u>all</u> directions.</p>
<b>Q7 Modification</b>	See 6a
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP129
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Gavin
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP131
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Gavin
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP762
<b>Order</b>	44
<b>Title</b>	Policy HOU2: Housing Mix and Density
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU2
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>In relation to criterion c) of draft Policy HOU2, Gladman maintain that sites for residential development in the Rural Centres should be able to achieve higher densities of between 25-35 dwellings per hectare (dph) so that national housebuilders would be interested in submitting bids on housing sites which benefit from planning permission. National housebuilders don't tend to submit bids on sites where the housing density is less than 30dph. Furthermore, the density formula set out under draft Policy HOU2 could work against balanced and diverse new housing across the borough and result in crowded schemes in the strategic (Newcastle-under-Lyme) and urban centres (Kidsgrove).</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP766
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU6
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman encourages the Council to ensure that draft Policy HOU6 has sufficient flexibility, as there is no guarantee that these units will be delivered, and there may be situations when they are difficult to deliver that may result in the non-delivery of otherwise sustainable land for housing. Gladman broadly support draft Policy HOU6 in respect of self-build and custom housebuilding in line with current government thinking and objectives. Gladman considers it essential, however, that the policy</p>

	wording should state that once a self-build and/or custom-build plot has been marketed for 6 months (rather than 1 year cited in the policy text under criterion 5) but failed to sell, it will revert to consideration by the Council to be built out as conventional open market housing.
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP770
<b>Order</b>	113
<b>Title</b>	Policy SE7: Biodiversity Net Gain
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE7
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman recognise the importance of this objective and the need to ensure that an environment is left in a measurably better state than found prior to development. The requirement to ensure at least a 10% biodiversity net gain (BNG) on developments was implemented earlier this year (12th February for large sites and 2nd April for small sites). The Local Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure, rather than the draft policy including the phrase "at least 10%", would provide this.</p> <p>Criteria 2 of draft Policy SE7 outlines the Council's aspiration for proposals for BNG should consider opportunities to form part of, connect to or support restoration of the Local Nature Recovery Network and implement opportunities identified in the Local Nature Recovery Strategy (LNRS). It would be helpful for the emerging Local Plan to include a link to this once it has been prepared, or if the Staffordshire LNRS is not available in time, a reference to the timetable for its production should be included.</p> <p>The Council should ensure that any future wording of the policy in relation to BNG is drafted in a way that is consistent with national policy and guidance, otherwise it risks being found unsound for failing to comply.</p> <p>With this in mind, Gladman would remind the Council of the updated guidance in the PPG that was published on 12th February 2024. It states: 'plan makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development'</p> <p>Gladman request further clarity from the Council on the availability of habitat banking and biodiversity units in the borough</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP746
<b>Order</b>	15
<b>Number</b>	4
<b>Title</b>	Strategic Objectives for the Borough
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd



<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Vision and Strategic Objectives
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Vision and Strategic Objectives</p> <p>In principle, Gladman support the Council's vision and objectives to deliver sustainable new homes and jobs to meet local needs, provide more opportunities for people and to support the growth of businesses, town centres and our university, whilst preserving and enhancing the natural environment, reducing carbon footprint and respecting and improving the character and distinctiveness of market towns, villages and other rural areas. This is in general accordance with the sustainability objectives included in paragraph 8 of the NPPF</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP750
<b>Order</b>	28
<b>Title</b>	Policy PSD4: Development Boundaries and the Open Countryside
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD4
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Policy PSD4 outlines the limited and specific forms of development that will be permitted beyond settlement limits and in the open countryside. Whilst recognising that the policy identifies instances where development will be supported, these are limited and render the policy overly restrictive.</p> <p>In the absence of an up to date development plan, NuLBC has been reliant upon the granting planning permission for major and minor housing development on a number of sites outside of existing settlement boundaries, including three sites in Loggerheads. The Framework is clear that development which is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would therefore not accord with the positive approach to growth required by the Framework.</p> <p>The policy wording as currently drafted only allows for development in a narrow set of circumstances (i.e. replacing existing dwellings, previously developed land, re-use of existing rural buildings etc.) and does not allow for sufficient flexibility to respond to changes of circumstance such as a shortfall in the</p>

	<p>Council's five-year housing supply position. Although the Council currently claim to be able to demonstrate a five-year housing land supply (Housing Land Supply Statement with a 1st April 2023 base date – 5.26 years), it has struggled to demonstrate a robust five-year housing land supply over the past decade due to the lack of available land within development boundaries and in areas which are not designated as Green Belt.</p> <p>Gladman believe that draft Policy PSD4 should be modified to a criteria-based policy which provides a more appropriate mechanism for assessing the merits of individual development proposals, based on their specific circumstances and ability to deliver sustainable development rather than being discounted simply due to a site's location beyond an artificial boundary.</p> <p>Gladman support a more flexible to development within villages and the countryside that recognises the important role these locations play in the provision of much needed homes. Settlement limit policies should be suitably worded to ensure that they can adapt to changing supply provisions and accommodate a broader portfolio of sites to be delivered in area which have experienced little to no growth in recent history to boost means of supply.</p> <p>This approach has been taken in the Ashford Local Plan (2019) which sets a positive and realistic approach for residential development adjoining the existing confines of a settlement, and in the Durham Local Plan, where Policy 6 provides flexibility for the delivery of unallocated sites. Gladman recommend the Council review these policies and consider amendments to Policy PSD4 accordingly.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP760
<b>Order</b>	42
<b>Title</b>	Policy HOU1: Affordable Housing
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU1
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman consider the best way to significantly increase the supply of affordable housing in the borough is to allocate over and above the housing requirement so that affordable housing can be delivered on these sites. This is especially pertinent considering that as of 16th May 2024, the number of households in the borough on the Council's affordable housing waiting list totals 2,531 households, which represents a substantial number of households in need of an affordable home within the borough. Furthermore, there has been no plan-led delivery of affordable housing through allocations in the borough for at least 20 years.</p> <p>This is the approach taken in East Riding of Yorkshire, where the Council has opted to increase their housing requirement to ensure that affordable housing needs are met. Whilst this approach is yet to be examined, this is an approach the Council could consider if it was found to be suitable.</p> <p>Gladman are supportive of the variation in requirement for affordable on greenfield and brownfield sites, recognising and responding to the high and low value zones across the borough. This approach will protect the viability of development, aiding housing delivery and ensuring that affordable housing can be provided across the borough. However, Gladman maintain that Criteria 1 should include the flexibility to enable a lower amount of affordable housing to be provided for viability reasons, especially on brownfield sites where demolition and potentially remediation costs need to be considered.</p> <p>Criteria 2 of the policy seems to require the affordable housing to be whatever the Council's Housing Team decide to request when asked. The policy should allow for flexibility and negotiation that reflects the site location and characteristics and not just the most up to date evidence of local housing need.</p> <p>Criteria 4 of the policy suggests that on-site affordable housing should be provided. In relation to providing off-site provision, Gladman are unclear how off-site affordable housing could be secured through a planning application and Section 106 Agreement relating to a different site, and therefore it is unclear</p>

	<p>what a developer would need to do to show compliance with the policy. Payment in lieu of affordable housing is the more typical approach to securing funds for affordable housing delivery elsewhere. Gladman are pleased to see the removal of footnotes from this draft policy following the Regulation 18 consultation. The use of footnotes with an ambiguous status had the potential to result in challenges about the weight to be applied to the footnotes and whether they are policy, supporting text or something else. Any opportunity for confusion or misunderstanding in policy working should be avoided.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP764
<b>Order</b>	46
<b>Title</b>	Policy HOU3: Housing Standards
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	HOU3
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Following consultation in summer 2020, the Government published its response in July 2022 proposing to mandate all new build homes, both market and affordable, to meet the M4(2) (accessible and adaptable dwellings) standard through a new requirement in Building Regulations<sup>1</sup>. The changes will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. As such, this should provide the Council with certainty that all new homes will be built to an acceptable standard.</p> <p>It is advised that the Council closely monitors these emerging amendments and if they are implemented in national standards, it won't be necessary to duplicate this in local planning policy.</p> <p>Criteria 4 of the policy requires all new dwellings to be built to the nationally described space standards (NDSS). The PPG is clear that "where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies."<sup>2</sup> To support this aspiration the Council will need to ensure that sufficient evidence is produced to justify this standard in line with national policy requirements and the PPG.</p> <p>Criteria 2 requires on all major residential developments and specialist housing for older people, 10% of market dwellings should meet the requirements of Building Regulations Part M4 (3) (2). Gladman are supportive of the need to provide an appropriate level of M4(3), however maintain that incorporating a policy for major developments to provide a fixed percentage of M4(3) Wheelchair User Housing is inappropriate.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP748
<b>Order</b>	267
<b>Title</b>	Appendix 6: Indicative Housing Trajectory
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager

<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	Appendix 6
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Appendix 6: Housing Trajectory</p> <p>The Final Draft Local Plan consultation document includes an indicative housing trajectory (in bar chart graph form) at Appendix 6, which sets out the projected rate of housing delivery against the housing requirement over the 2020-2040 plan period. However, there are no dedicated site-by-site breakdown or site analysis projections provided at this stage to demonstrate that all the sites which have been identified as draft housing allocations by the Council will realistically deliver in full by the end of the plan period.</p> <p>There is no detail as to where the housing numbers are derived from an approved outline application, a full application, or an application with reserved matters, or whether they are allocations, or indeed informed by the expected windfall allowance. This is not a clearly evidenced nor robust trajectory and does not provide a sufficient piece of evidence to inform the Local Plan. The housing delivery could not reasonably be expected to be assessed against this throughout the plan period, therefore making it highly difficult to monitor the effectiveness of the Local Plan and the housing land supply position. It is pertinent to note that the total supply from Local Plan allocations comprise 56.4% of the Council's minimum overall housing requirement.</p> <p>Paragraph 74 of the NPPF states that:  "strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites."</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP752
<b>Order</b>	37
<b>Title</b>	Policy CRE1: Climate Change
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CRE1
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman recognise that the planning system has an important role to play in tackling the effects of climate change, as outlined in paragraph 8 of the NPPF which highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low carbon economy.</p>

	<p>This objective filters through to other elements of the Framework, including section 14, which deals specifically with climate change. In this regard, paragraph 152 of the Framework identifies how the planning system should:</p> <p>“support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”</p> <p>Gladman recognise the importance of tackling climate change and encourage sustainable housing developments to mitigate its impact. The Council should continue to take account of climate change in its plan-making, including any updates to guidance to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, competitive economy.</p> <p>The Council declared a climate emergency in April 2019 and have the aim of becoming a carbon-neutral borough by 2030 and reaching net carbon zero by 2050. Since 2019, the Council have already reduced carbon emissions by 43%. Gladman is committed to contributing to this through our land interest at land south of Eccleshall Road, Loggerheads which can provide environmental commitments to assist the Council in meeting its climate related strategies. At the detailed design stage, renewable energy technologies can be considered, and these proposals will be in line with energy performance and efficiency targets. In addition, a Construction Environmental Management Plan will be submitted at the reserved matters stage to secure best practice measures such as Modern Methods of Construction and keeping landfill waste to a minimum.</p> <p>Criteria 2 of draft Policy CRE1 seeks to require all new development will be expected to meet the carbon emission targets set by UK Building Regulations (Part L of the Building Regulations or as amended / updated). It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual councils specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards in a Local Plan policy because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.</p> <p>Criteria 3 of the policy states that all residential development proposals must also show compliance with a water efficiency standard maximum of 110 litres per person per day. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.</p> <p>As set out in the NPPF (paragraph 31), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, should justify doing so by applying the criteria set out in the PPG (ID: 56-014-20150327). PPG states that “Where there is a clear local need, local planning authorities can set out local plan policies requiring new dwellings to meet the new tighter Building Regulations optional requirement of 110 litres per person per day”. PPG (ID: 56-015-20150327) states the ‘it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement’. The Government's Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP769
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q6 Details</b>	Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman



	<p>has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman support the policy's intention to secure developer contributions for infrastructure and facilities, subject to viability. The supporting text is clear that this can be done through Section 106 obligation and/or through any future Infrastructure Levy if one is introduced.</p> <p>Gladman would welcome an inclusion into the supporting text for negotiation regarding contributions when a development is rendered unviable by a proposed planning obligation. This ensures this policy is not restrictive and has an appropriate level of flexibility to allow sustainable development sites to come forward.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP749
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>Gladman are supportive of the proposed hierarchy of centres set out within the settlement hierarchy. It follows that in formulating the spatial strategy and making site allocations that this same principle should apply. Loggerheads for example has demonstrated over the last decade that it can support and deliver new housing growth opportunities in the short / medium term which has helped assist the local planning authority in meeting its housing need. This is demonstrated by the three sites which are currently under construction in the village, including 128 homes at Tagedale Quarry, 73 dwellings at land south of Muckleston Road and 55 dwellings at land off Eccleshall Road.</p> <p>In promoting sustainable development patterns, Gladman agree that development proposals should be directed to the most sustainable settlements in the first instance. The correct settlement hierarchy is essential in developing a sustainable spatial strategy.</p> <p>The main urban areas of Newcastle-under-Lyme and Kidsgrove are constrained by the North Staffordshire Green Belt. Green Belt also constrains the settlements of Keele, Madeley and Audley Parish. Gladman support the allocation of 450 new homes to Loggerheads over the plan period, however we suggest it could accommodate a higher proportion of overall housing growth due to it being the only settlement in the borough not constrained by Green Belt. In addition, Loggerheads has all the everyday local facilities and services available in the village for new and existing residents and additional growth will ensure their vitality.</p> <p>Gladman suggest amending the terminology of 'in the order' to 'a minimum' to allow for more certainty that this level of housing will be delivered over the plan period. Furthermore, it would allow for sustainable housing proposals adjacent to settlement boundaries which are not allocated by the Council to come forward in scenarios where the Council is unable to demonstrate a robust five-year housing land supply position. It also aligns with the boost to the supply of housing outlined in the NPPF.</p>



<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP771
<b>Order</b>	140
<b>Number</b>	13
<b>Title</b>	Site Allocations
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	Site Allocations (Omission Site)
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>As demonstrated in the Site Selection Report and Assessments report, there is minimal difference between sites LW53 (land corner of Mucklestone Wood Lane &amp; Rock Lane, Loggerheads) and LW54 (land south of Eccleshall Road, Loggerheads) in terms of the planning policy team's comments and conclusions on both of the sites.</p> <p>The SHELAA and Site Selection comments for LW54 are pretty much identical. There is discussion around a reason for refusal based on landscape impact on the character and appearance of the area in relation to two outline applications on a neighbouring site. The comments also note that the site is close proximity to a number of listed buildings – it is anticipated that there will be no objection from the Conservation officer in response to Gladman's application on the site. Its pertinent to note that one of the reasons for refusal on the application on LW53 was due to the impact on a nearby listed building. The Sustainability Appraisal (July 2024) scores LW53 marginally better than site LW54 on four technical aspects as shown in the table below (see attachment):</p> <p>Gladman have provided comments on each of the disciplines below:</p> <p>Air – LW54 does not lie in Air Quality Management Area and proposed residential development on the site would not lead to unacceptable pollutions levels. This score should therefore be negligible. It is pertinent to note there is no objection to Gladman's application (24/00162/OUT) by the Environmental Health Officer in relation to air quality concerns.</p> <p>Biodiversity, Flora &amp; Fauna – The proposed scheme would be able to achieve a 7.32% BNG on-site (+2.47 habitat units) and +2.24 hedgerow units (+29.82%). The remainder BNG units (2.68%) are to be provided off-site from a habitat bank. The southern area of the site would be kept free from any developable area. This score should therefore be minor positive.</p> <p>Cultural Heritage – There is a Grade II Listed Milepost which is situated to the north of the site on Eccleshall Road. The Heritage report submitted in support of the application concludes that the site does not have a relationship to the milepost either at present or historically and as such does not contribute to the setting, or significance of the designated asset. Furthermore, there was no heritage reason for refusal identified for the Tadgedale Quarry planning application and it is anticipated to be the same for site LW54. At the time of writing, the Conservation officer has not responded to Gladman's application on the site. This score should therefore be negligible.</p> <p>Flooding – LW54 is situated in Flood Risk Zone 1 and is therefore at the lowest risk of flooding (&lt;1 in 100 chance). The brook which runs along the southern boundary of the site is at risk from surface water flooding, however as shown on the indicative Development Framework Plan, Gladman is not proposing to locate any developable area along the southern boundary parcel and this area will be kept as public open space. This score should therefore be negligible.</p> <p>Land south of Eccleshall Road, Loggerheads</p> <p>Gladman is promoting land south of Eccleshall Road, Loggerheads ('the site') for residential development. Gladman submitted an outline planning application for up to 150 dwellings on the site to the Council in February 2024 (application ref: 24/00162/OUT). The application is currently under consideration by the Council and a decision is anticipated in autumn 2024.</p> <p>A Site Location Plan is included on Figure 1 below (see attachment).</p> <p>Site Context and Surroundings</p>

The 9.11 ha site comprises two arable fields and is located in the administrative area of NuLBC. It is bound by Eccleshall Road to the north with a residential development for 128 homes, which is currently under construction by Wain Homes beyond. Shropshire Homes have a 'live' appeal for up to 130 dwellings on land to the east of Rock Lane / north of Mucklestone Wood Lane3 which is situated to the north-east of the site.

To the east, the site is bound by a cluster of residential dwellings and includes hedgerows and garden fences along the boundary. A Waste Water Treatment Plant is situated to the south-east beyond the site boundary. To the immediate south of the site is a dense and mature tree line along the Tadgedale Brook, with arable farmland and Ben's Eggs Farm located immediately beyond. Further south is Oakley Folly Road (A53) bounded by a partial hedgerow to either side. Beyond lies a small cluster of residential dwellings within arable land and a large area of woodland (Burnt Wood SSSI), with a cul-de-sac residential development located within it. The Leightons Drumble Local Wildlife Site is located partially on-site, within the south east section along the stream corridor encompassing the woodland belt, ponds and Tadgedale Brook.

The site is sustainably located with a number of services and facilities within easy walking and cycling distance, including a primary school, a convenience store, a post office and a church. In addition, there is a bus service (no. 64 Shrewsbury - Hanley) throughout the day (Monday – Saturday) to the larger settlements of Market Drayton, Newcastle, Hanley and Shrewsbury.

#### New Homes

The site would be deliverable in the short term and will help to increase the supply and choice of housing in Loggerheads. The site can deliver a wide range of market and affordable homes to meet the borough's general and specialist housing needs, with potential to deliver up to 150 new homes. The site would deliver a policy compliant level of affordable homes. The development of the site would contribute significantly towards the Council's affordable housing supply requirements, without subsidy, and would provide people with the opportunity to have an affordable property to call their own.

Furthermore, development of the site would contribute towards economic growth and have wider social benefits to the local community including increased footfall for existing businesses, helping to sustain their vitality.

#### Landscape

The site is not subject to any landscape quality designation and lies outside of the Green Belt. It is anticipated that the landscape character of the site and immediate context has the ability to accommodate the proposed high-quality residential development, which includes extensive green infrastructure proposals.

#### Highways

It is proposed that the site will be accessed from Eccleshall Road, forming a 'T' junction which will operate under priority control. The site access will measure 5.5m wide with 2.0m wide footways. Eccleshall Road will be widened (on the site side) to provide a right turn lane, formed by ghost island hatching, to cater for movements into the site access. It has been confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic.

#### Heritage

There Heritage Desk-Based Assessment submitted in support of Gladman's application, notes that there is a Grade II milepost which is located on the verge to the north of Eccleshall Road which is now largely masked from the road by a substantial hedge which lies to its rear. It derives its significance from its architectural and historical value as a cast iron milepost. The site is screened from the milepost by a substantial hedgerow which defines the southern edge of Eccleshall Road/the northern boundary of the site. Views of the asset along the line of Eccleshall Road are limited due to the hedgerow and topography. The site does not have a relationship to the milepost either at present or historically and as such does not contribute to the setting, or significance of the designated asset.

#### Flood Risk

The site falls within the Environment Agency's flood risk zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding from rivers or the sea). It is anticipated that the site will be at low risk from all sources of flooding and will not increase the risk of flooding elsewhere as a result of the development of the site.

#### Green Infrastructure

The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The green infrastructure will contribute positively to the site's landscape character, enhance biodiversity and provide community benefits through the provision of public open space and recreational facilities.

#### Development Framework Plan

Gladman has prepared an indicative Development Framework Plan to indicatively demonstrate how any development on the site may take shape and how the aforementioned benefits will be integrated into the site. This Plan is included at Figure 2 below.

There are multiple benefits that could be delivered through residential development at this location:

- The provision of up to 150 homes, of which 30% can be affordable housing (compliant with draft Policy HOU1). This should be considered as a significant benefit in the context of the affordable housing driven strategy.
- New residents will increase demand for and use of local services and facilities. This increased spending in the locality will help protect, maintain and enhance the services in the area, ensuring the long-term viability and vitality of the settlement.
- The scheme can deliver public open space and green infrastructure for use by new and existing residents. Its long-term management can be secured to safeguard its use for the community, and the improved connectivity to the public rights of way in the area.
- Biodiversity will be protected, diversified, and improved through new hedgerow and tree planting, landscaping and informal green spaces. The provision of 10% BNG on-site.

	<ul style="list-style-type: none"> <li>There are multiple economic benefits to be realised through the provision of housing. The delivery of this site will generate construction spend, annual household expenditure and supporting a relatively significant number of Full-time Equivalent (FTE) and indirect FTE construction jobs. Overall, Gladman consider that land south of Eccleshall Road, Loggerheads is a suitable and sustainable location for development. The site is available and can be delivered in the early years of the plan period which will assist the Council in meeting its future housing needs and boosting its five-year housing land supply. Gladman would welcome further discussions with the Council during the Local Plan's preparation. Gladman welcomes the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan Document. These representations have been drafted with reference to the National Planning Policy Framework (December 2023) and the associated updates that were made to Planning Practice Guidance. It is essential that the Council prepares a positive plan that can stand up to scrutiny at examination. Gladman have provided comments on issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored in advance of the Council submitting the Plan to the Secretary of State for Examination. Gladman formally requests to participate at the Examination in Public to discuss the issues raised with this representation.</li> </ul>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP747
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p><b>Plan Period</b> Paragraph 22 of the NPPF sets out that strategic policies should look ahead over a minimum 15-year period from adoption. The term minimum is notable as it makes it explicit that the requirement is 15 years or more, not around 15 years which could justify a lower plan period being advanced.</p> <p>Gladman note that in terms of the timescales for the emerging Newcastle-under-Lyme Local Plan 2020-2040, the most recent Local Development Scheme (January 2024) anticipates that the emerging Local Plan will be adopted by the Council in Q4 2025. Gladman suggest there is merit in extending the plan period until 2041, allowing for a suitable buffer to account for any minor setbacks in the plan-making process whilst still ensuring that the Plan will look ahead over a minimum 15-year period from the date of adoption.</p> <p>An extended plan period would result in the need to allocate additional sites to meet an increased minimum overall housing requirement. Gladman are promoting a suitable site in land south of Eccleshall Road, Loggerheads, which is consistent with the settlement hierarchy set out in draft Policy PSD3, that represents a suitable and deliverable opportunity that can be delivered in the short-term to boost the Council's housing land supply position in the early years of the plan period.</p> <p><b>Policy PSD1: Overall Development Strategy</b> Draft Policy PSD1 sets out provision will be made for a minimum of 8,000 dwellings to be delivered in the borough over the plan period 2020-2040, which is an increase of +860 dwellings in comparison to the First Draft Local Plan consultation (2023). Gladman welcome the recognition that the overall housing requirement is being expressed as a minimum.</p> <p>Gladman welcome the Council being proactive by using its 'Housing and Economic Needs Assessment' (HENA) 2024 derived figure (400 dwellings per annum) over the plan period rather than the current local</p>

	<p>housing need figure of 347 dwellings per annum, which resulted in an overall housing requirement of 6,950 dwellings. The modelling undertaken in the HENA suggests that exactly 400dpa could be needed to accommodate this growth and support the creation of 237 jobs every year to 2040. Such a level of housing provision would also align almost exactly with the average housing delivery in the borough over the last five monitoring years (399dpa). The NPPF supports the delivery of housing above the standard method where it is justified by a local economic strategy.</p> <p>Table 2: Housing Requirement Supply Information sets out that the Council has a total deliverable supply of 8,663 dwellings over the 2020-2040 plan period, which equates to an 8.3% flexibility allowance against its minimum overall housing requirement (8,000 dwellings)</p> <p>. Many representatives within the development industry advocate for a flexibility buffer of between 10-20% which is considered suitable to mitigate against delays in delivery as a result of changes in the economic context. The housing land supply contingency should be added to the minimum overall housing requirement and remain flexible in the event of delayed delivery and changes to the planning context. Gladman stress that it is necessary for the emerging Local Plan to provide flexibility in the deliverable land supply as there can be no guarantee that all sites with planning permission, or all sites which have been identified for allocation, will deliver as the Council currently anticipate.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations
<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
<b>Comment ID</b>	NULLP751
<b>Order</b>	34
<b>Title</b>	Policy PSD7: Design
<b>Consultee Company / Organisation</b>	Gladman Developments Ltd
<b>Consultee Position</b>	Planning Manager
<b>Consultee Family Name</b>	Wilding
<b>Consultee Given Name</b>	Robert
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD7
<b>Q6 Details</b>	<p>Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Newcastle-under-Lyme Final Draft Local Plan 2020-2040 (Regulation 19) consultation and request to be updated on the progress of the emerging Local Plan. Please refer to attached representations. Gladman has fully engaged fully in the preparation of the emerging Newcastle-under-Lyme Local Plan 2040 to date. Feedback from the First Draft Local Plan (Regulation 18) consultation has been addressed and incorporated into the Final Draft Local Plan consultation document.</p> <p>In the sections below, Gladman have made specific comments where we consider the Final Draft Local Plan requires modifications or further clarification to ensure that it is capable of being found sound. Comments are focussed mainly on the consultation document, with references to the Duty to Cooperate and Sustainability Appraisal documents. Our representations also include details of Gladman's land interest at land south of Eccleshall Road, Loggerheads, which we are promoting as suitable for identification as a housing allocation in the emerging Local Plan. Please refer to attachment for more information.</p> <p>The new National Design Guide: Planning practice guidance for beautiful, enduring &amp; successful places (January 2021), the NPPF 2023 and National Model Design Code (updated October 2021) set the framework for the characteristics for creating beautiful, high quality sustainable places. Gladman support the principles of draft Policy PSD7 and the requirement to accord with the National Design Code, National Design Guide or any local design guide or code.</p> <p>We endorse the Council's approach to ensure that housing developments achieve Building for a Healthy Life standard, create high-quality, beautiful and sustainable buildings and places and should be accessible and inclusive to all. A range of different disciplines across sectors and should be involved at an early stage to produce a range of ideas, interventions and solutions to help shape future development.</p> <p>Criteria 4 of the policy requires major development schemes should demonstrate that design proposals have responded positively to the Council's Design Review process. Gladman recognise the importance of good design but note from experience of design review panels that they often, whilst well intentioned, frustrate the planning process at the outline planning application stage.</p> <p>Gladman note that draft Policy PSD7 repeats the requirements for housing developments to achieve Building for a Healthy Life standard. This should be addressed either in Policy PSD6 or Policy PSD7, not both.</p>
<b>Q7 Modification</b>	Please see attached representations
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	Please see attached representations

<b>Attachments</b>	<a href="#">1300003 Gladman representations.pdf</a>
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<b>Comment ID</b>	NULLP1415
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wilkes
<b>Consultee Given Name</b>	Allan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>



will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1362
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Wilkes
<b>Consultee Given Name</b>	Allan
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in</p>

	<p>our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1473
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Wilkes
<b>Consultee Given Name</b>	Lorraine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1474
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wilkes
<b>Consultee Given Name</b>	Lorraine
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss</p>

of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has

	<p>recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Not enough school spaces</p> <p>Roads infrastructure not adequate</p> <p>Doctors and dentist over stretched now</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP1229
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy SD3 says:</p> <p>1. The strategic centre of Newcastle-under-Lyme is expected to accommodate in the order of 5,200 new homes. SP11 provides for an expected 900 housing units within a county park . There is no clear reasoning for this number of units or indeed a 2nd country park within this area. There is scope within SP11 to increase the housing numbers to meet an increased housing target. The policy also says:</p> <p>3. The rural centres are expected to accommodate development of the scale shown below: Audley and Bignall End (joint) in the order of 250 new homes.</p>
<b>Q7 Modification</b>	<p>Clearly in light of the shortfall within the plan a significant increase in housing allocation for Newcastle under Lyme District and also for Audley change is required. The allocation of site SP11 provides for 900 units. This should be increased in line with revised national targets.</p> <p>It is suggested that for Audley site AB75 should be included within the plan. This addition could deliver an additional 136 units. This site adjoins AB12 and can provide a safe and secure access to both AB75 itself and AB12 which does not have any suitable and safe access. In addition the economies of scale associated with this conjoined development can provide sufficient viability to support linked community gains.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1237
<b>Order</b>	127
<b>Title</b>	Policy SE14: Green and Blue Infrastructure
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SE14
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The response is simply a question and possible qualification. Should Lyme Park; as a new country park and accordingly new green infrastructure, be included within this policy?
<b>Q7 Modification</b>	This is simple question. The intent being to lock in the delivery of the country park. There are no suggestion for text.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1240
<b>Order</b>	204
<b>Title</b>	Policy SP11 Lyme Park, Silverdale
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard



<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SP11
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy SP11 Lyme Park, Silverdale</p> <p>This policy is a key plank of the council's housing delivery. It is critical for this reason alone. It is accordingly critical that the policy leads to the delivery for what it intends.</p> <p>The key housing allocations within this policy are:</p> <p>SP11 (1) – Keele Square – a development of 255 homes.</p> <p>SP11 (2) – Keele Woods – a development of 310 homes.</p> <p>SP11 (3) – Ashbourne Drive – a development of 235 homes.</p> <p>SP11 (4) – Park Road – a development of 100 homes.</p> <p>Delivering a new and additional country park is seen to be a core and inextricably linked part of the policy.</p> <p>The policy says:</p> <p>"The provision of a country park to include the retention of trees and maintenance of a high quality ecological and natural resource with appropriate walking and cycling routes through the site". It is stated that a masterplan and design code must be produced. The policy says: That the development must be supported by the 'preparation and agreement of a masterplan and design code prepared for the site which should be prepared in line with Policy SA1 (General Requirements)"</p> <p>It is extraordinary that this policy has been devised without any pre-consultation with key landowners whose support is necessary for delivery. This occurring despite repeated requests to engage with policy formulation together shared landowners. The council's policy team and estates team have ignored all requests. This is unfortunate. The policy as stands is both harmfully constricting, without apparent justification and with little attention given critically to delivery. These concerns are set out below:</p> <p>Unnecessarily constraining</p> <p>The new housing targets imposed by Government seeks an increase to 593 units per annum. This is an increase of 80%. Even if the councils stated figure of 400 units per annum is taken the new national target of 593 annual units would leave the plan with a 48% undersupply of housing. As a result of recent national housing targets the target for 900 units is too low.</p> <p>Lack of Justification</p> <p>Laudable as the delivery of 2nd country park (the other is Apedale) in this location might seem the policy contains no clear evidence of a local need for such a facility or evidence of a shortage of such a feature either.</p> <p>Delivery, ownership and management of county park</p> <p>The policy says that the country park is critical and that the 4 new housing allocation will sit within a county park.</p>
<b>Q7 Modification</b>	<p>The site allocation ought to be revised to accord this target which would be with an additional allocation which would increase the allocation by between 48% and 80%</p> <p>Increasing housing numbers on this site from 900 units will assist in meeting new national housing targets. Whilst the provision of housing sites within a new country park is dreamily ideal the council inexplicably have sought at this strategic stage of plan making to set out in detail the boundaries of all 4 housing allocations within the site. Four sites are identified with each having a housing target and defined boundary. Plan making; when done soundly ought to be clear and and capable of delivery. The draft plan gives no indication whatsoever as to how these boundaries for sites 1 to 4 have been defined. To do so in this way and especially in advance of a masterplan, archeological detail, transport study, flood/drainage assessment and other possible development constraints is at best misplaced and at worst foolhardy. If the policy is adopted in this form it would fail to provide the necessary flexibility for change that future detailed site assessment would require. It is not necessary to do so at this stage.</p> <p>As the provision will require funding both to provide and maintain and planning policy evolution ought to be based upon meeting needs and not simple whimsy the council ought to be obliged to set out clearly what. Country park in this location is needed.</p> <p>If it is critical then the council ought to set out clearly how it is to be delivered, its phasing its future ownership and how it will be funded and how and who will maintain it. The policy is silent on these matters for this critical land use. Without the plan addressing these matters there is significant doubt about the delivery of the country park.</p> <p>To give the necessary flexibility to meet new housing targets and to ensure proper and sound planning the policy should be changed by:</p> <p>A Increasing the target housing numbers for this site upwards from 900 units in line with new national targets.</p> <p>B Omit the defined housing areas 1 to 4 and simply define the allocation in this way:</p> <p>"Land at Lyme Park, Silverdale is allocated for residential, and community uses within a wider Country Park setting. Development shall proceed in accordance with a masterplan, delivery strategy and design code which addresses especially design, access, topography, sustainability, flood risk/drainage, archeology, land and mining stability, landscaping and ecology.</p> <ul style="list-style-type: none"> <li>• Detailed development thereafter shall proceed in accordance with the agreed masterplan.</li> <li>• The delivery strategy must address the phasing of the housing units and community use and the country park making provision especially for the future protection, ownership and management of the country park".</li> </ul> <p>Note</p> <p>For such an important allocation it is a full of uncertainties. In addition to those above the following is of concern. 13.177 Walleys Quarry Landfill site which is currently operational is located in close proximity of the site. No dwellings on parcel 4 on Park Road should be occupied until the operation of Walleys</p>

	Quarry as a landfill site has ceased which is anticipated in 2027. This will mitigate against potential polluting impacts from the landfill site. The development of the site will also give consideration to the Staffordshire Waste Local Plan and particularly safeguarding policy 2.5. The council surely must understand that when the delivery of housing units is so significant locally and nationally it is folly to adopt policy with is such uncertain. Tying housing delivery to events off site and beyond council control is not sound.. As stated above such concerns would be better addressed via a masterplan and deliver statement.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1227
<b>Order</b>	21
<b>Title</b>	Policy PSD1: Overall Development Strategy
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy SD1 says:  A minimum of 8,000 dwellings will be delivered in the Borough over the Plan period 2020 – 2040 which equates to 400 dwellings per annum.  The government advises the following in respect of plan preparation in light of its new agenda which seeks a significant increase in housing targets. The Government now advises:</p> <ul style="list-style-type: none"> <li>• For plans at an advanced stage of preparation (Regulation 19), it means allowing them to continue to examination unless there is a significant gap between the plan and the new local housing need figure, in which case we propose to ask authorities to rework their plans to take account of the higher figure. In the case of Newcastle under Lyme the existing method of housing growth seeks an annual allocation of 330 units (according to the governments records). The new housing targets imposed by Government seeks an increase to 593 units per annum. This is an increase of 80%. Even if the councils stated figure in the draft plan of 400 units per annum is taken the new national target of 593 annual units would leave the plan with a 48% undersupply of housing. This is a significant under supply.</li> </ul>
<b>Q7 Modification</b>	The plan is unsound and should be updated to meet the new target because there is a significant gap in housebuilding rates between the draft plan and new Government targets.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1231
<b>Order</b>	32
<b>Title</b>	Policy PSD6: Health and Wellbeing
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	This draft policy seems to omit the delivery of a new country park (Lyme Park). It is explained that Lyme Park is needed to boost health and well being. If this is the case then policy PS6 ought to include a requirement for the delivery of this park.
<b>Q7 Modification</b>	No dwelling within allocation SP11 shall be occupied until the boundaries of the associated Country Park have been set out and its main features provided or protected in accord with a delivery, management and maintenance plan for the park. The intent being to ensure certain delivery of this new country park which the Council say is needed for health and well being.

<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1235
<b>Order</b>	86
<b>Title</b>	Policy IN1: Infrastructure
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	IN1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy IN1: Infrastructure</p> <p>In common with many plans up and down the Country the council has not sought to maximise infrastructure delivery. It clings on to simple allocations of housing and employment land. It could have; with the right ambition; studied infrastructure deficiencies and sought to make allocations designed to deliver sufficient housing and employment to bring about improvements in highways, health care and community services. It has sought to provide for a 2nd country park in the Silverdale area (Lyme Park) but the justification for it are absent at worst or not clearly expressed at best. Moreover the allocation of SP11 fails to set out how the country park will actually be delivered and how it will be maintained.</p>
<b>Q7 Modification</b>	IN1 should be expanded to include policy to ensure delivery of Lyme Park. Policy/text could say: No dwelling within allocation SP11 shall be occupied until the boundaries of the associated Country Park (Lyme Park) have been set out and its main features provided or protected in accord with a management and maintenance plan for the park. The intent would to ensure certain delivery of this new Country Park which the Council say is needed for health and well being. The country park shall be fully open and available for use before commencement has been made on the 451st dwelling (1/2 the allocation).
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1239
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy AB12 Land East of Diglake Street</p> <p>The draft policy says: Access to the development being via Diglake Street (with emergency access via Raven's Lane / B5500) and pedestrian access provided via Raven's Lane / B5500, Diglake Street and the Albert Street play area.</p> <p>This is not considered to be a suitable and safe access to the site. It is critical in making such allocations which are tantamount to Permissions in Principle to ensure that safe and secure site access can be formed. This is not the case with this proposal. As such there is an objection both to this clause and to the whole allocation as it stands.</p> <p>Site AB75 (Land West of Bignall End Road) has at present been overlooked by the council. It shares a common boundary with AB12 and could be developed contingent with it. Importantly site AB75 has the potential to form a main vehicular access sufficient to serve itself and the adajacent site AB12.</p>
<b>Q7 Modification</b>	<p>An extension to the allocation to say the following would be supported. Policy AB12 Land East of Diglake Street together with Site AB75( Land West of Bignall End Road)</p> <p>With regard to access the revised policy could read: "Vehicular access to the development (AB12 ad AB75) must be via Great Oak Road and pedestrian access provided via both Great Oak Road, Bignall End Road Raven's Lane / B5500, Diglake Street and the Albert Street play area to maximise permeability.</p>

	Note Your attention s drawn to the attached Technical Note prepared by SCP (Appendix A)
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1230
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Policy PSD5: Green Belt says:</p> <p>The Plan will alter the Green Belt boundary only to:</p> <p>a. Support the allocation of the following Green Belt sites in the Local Plan</p> <p>b. AB12 Land east of Diglake Street;</p> <p>Site AB12 has no suitable or safe access and Audley fails to provide for sufficient housing to meet the new national housing targets. Allocations in Audley ought to be increased by between 48% and 80 % dependent upon changed housing targets. This can be met in large part by the allocation of site AB75 which adjoins AB12 and which has a demonstrably safe access for itself and site AB12.</p>
<b>Q7 Modification</b>	<p>This policy ought to be extended to include site AB75 which adjoins AB12 and could be developed at the same time and provide a safe a secure access to both sites. In respect of site SP11 Lyme Park, Silverdale; Taking all of SP11 out of the Green Belt is supported. It will provide now a new a clearly defined boundary beyond the new housing and country park.</p> <p>Note This revised Green Belt boundary in this area according to the proposals map includes all of SP11 and the associated new Lyme Park as being taken out for the Green Belt. This is supported.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1234
<b>Order</b>	54
<b>Title</b>	Policy HOU6: Self Build and Custom Dwellings
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD6
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The policy is generally supported. With more imagination and intent to meet the aspirations of self builders a policy change to support small plots for self build within or adjoin villages can do much to boost the supply of such sites that would be of interest to self builders. Generally and as a matter of proven fact self builders are rarely interested in sites forming part of large scale new housing sites. It is simply not what self builders seek. They seek singular or small sites within or adjacent to villages in the main</p>
<b>Q7 Modification</b>	<p>If the council is serious about boosting such supply the policy should be tweaked to read something like:</p> <p>The Council will view applications for self-build and custom-build housing favourably, subject to proposals being in accessible and sustainable locations and compliant with all other relevant Local Plan policies. Preference will be given to proposals located on suitable brownfield sites, infill plots within existing development curtilages "or small sites of no more than 2 units sites that adjoin villages".</p> <p>Nb My highlighting to show the suggested change.</p>
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>
<b>Comment ID</b>	NULLP1238
<b>Order</b>	141
<b>Title</b>	Policy SA1: General Requirements
<b>Consultee Company / Organisation</b>	Bignall End
<b>Consultee Family Name</b>	Willard
<b>Consultee Given Name</b>	Gerald
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	SA1
<b>Q5 Sound</b>	Yes
<b>Q6 Details</b>	This is supported: 'For major sites of 10 or more dwellings or 0.5 hectares or more site wide master plans will be prepared by the applicant and agreed with the Council to deliver high quality, sustainable and policy compliant developments. Masterplans will also be required for major commercial sites'.
<b>Q7 Modification</b>	There are no suggestions.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Q9 Hearing reasons</b>	In seeking the following modifications to the plan, I do consider it necessary to participate in examination hearing session(s) in order advise the inspector of my clients concerns and to respond to any questions that the inspector may have.
<b>Attachments</b>	<a href="#">1308626 G Willard.pdf</a>

<b>Comment ID</b>	NULLP602
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I am sending my objections to the B2 proposal. This area is on a daily basis at least twice a day has either very slow traffic or at a complete standstill which then results in utter chaos of cars in the parish trying to avoid that area in roads that have not got the Capacity to cope with the increase of traffic, this is at any time of the day not just peak times of the day I also believe that the access and exit proposed are not safe. In the event of an emergency, no emergency vehicle would find access to the area straight forward or safe to do so. Also there is no suitable emergency exit that would be safe to use, if using narrow country lanes to do so that would impede all emergency vehicles that would be needed possibly to save lives.</p> <p>This area is also prime farmland which we need to protect so we can continue to feed the nation from locally sourced produce and not import from over seas therefore lessening the carbon footprint and continue to grow food that is not modified to grow faster for profit. We need to be more efficient in producing food especially in a world that is very volatile and could lead to food shortages. Once lost our ability to farm good quality produce we will never regain that capability again as all prime agricultural land will be lost forever</p>
<b>Comment ID</b>	NULLP601
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>I am informing you of my objection for the proposed development, this is a busy road continually used by motorists avoiding the A500 due to the traffic already on that road.</p> <p>Again I question the safety of another junction in a area that has roads already off Nantwich Road in a close proximity and added congestion.the area already has a poor transport network with minimal buses and this will do nothing to reduce carbon footprint, there are several places In the local towns ie the old jubilee baths that can be converted to desirable affordable housing with good transport links and a bus service that is already in place to Serve all areas This proposed area is also prime agricultural land which we need to maintain for us and future generations so we are not reliant on overseas food imports and again promoting out self sufficiency Lastly we have a good gp practice, chemist and schools and this will be put at risk if this village becomes any larger</p>
<b>Comment ID</b>	NULLP600
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	Andrew
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>I object to this proposal due to the environment in and around this area, to access this it would be via Vernon aVenuue which is a very busy road that is double parked on a regular basis and is already used to reach several other roads.</p> <p>The land proposed has not got good drainage so can cause future flooding that is more severe that at present Again this land is agricultural which we need to have the foresight to protect, care for not only for our self's but future generations that will have freshly grown local produce and in doing so helping the environment and carbon footprint</p>



<b>Comment ID</b>	NULLP1426
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b>  Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b>  Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b>  Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b>  We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1372
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	David
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods</p>

	<p>affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP457
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	Janet
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q6 Details</b>	<p>I strongly object to this proposed warehouse development. I believe this is a very unsafe and dangerous area to use as a development and access and exit would not be suitable and will only add to a very busy and congested area which regularly has a negative impact on the entire parish as well as Alsager and their local roads. There is no suitable area to use as an emergency exit if needed such as Park Lane as if haulage is using that very narrow Road emergency vehicles cannot access for any reason which could endanger local people and communities I also feel there are enough vacant warehouses in Staffordshire such as Alsager Peacocks Hay and many more which I'm sure you should already be aware of. Finally this is prime farming land and should be protected and encouraged to produce the food that we all need, especially to protect the environment and so we can lessen our dependency on foreign countries to provide food or meat we should be growing that would benefit the entire country and lessen the carbon footprint.</p> <p>I hope that you will take this opportunity to protect and help to provide communities with locally grown produce</p>
<b>Comment ID</b>	NULLP603
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	Janet
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>Again I object to this proposal due to the access problems it would entail due to Vernon Avenue already being an access point for the estate and the amount of traffic parked on both sides of the road. Again this is farming land and as a result of environmental concerns this should continue to produce food that does not need to be imported from abroad and as such lessening our carbon footprint and work towards our increased self sufficiency and more affordable and accessible to fresh produce</p>

<b>Comment ID</b>	NULLP1378
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	John and Christine
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1436
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Williams
<b>Consultee Given Name</b>	John and Christine
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be



	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>We figure that this area is not suitable for housing with the amount of houses built on farm land which has also got archialogical history. There has been a saxon brass excavated in the field bordering bells hollow by the farmer (redacted by admin) which now stands in Chesterton Church in the hallway. I am sure there must be more saxon artefacts buried in this area hence the name of the road 'bells hollow'. A saxon brass so hence there must have been a church and other historical artefacts</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP55
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Wilson
<b>Consultee Given Name</b>	Angela H
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>I wish to comment on the Regulation 19 Draft Local Olan for the Borough of Newcastle under Lyme. With reference to page 129 "Policy LW53 Land at Corner of Mucklestone Wood Lane". I consider that the inclusion of this land for future housing development is both unacceptable and extremely puzzling and also not compatible with the current National Planning Framework 2023 (the NPPF2023). I also challenge the plan on the grounds that numbers within this Policy have not been justified – "Distribution of Development PSD3 -page 16 of the draft plan. Development here (LW53) would be unsustainable. This was endorsed unanimously by the council's Planning Committee on 27th February 2024 when outline planning permission for housing development was refused on this site. Reasons given at this meeting include the following:</p> <p>1 Lack of supporting infrastructure in general: very limited public transport which would mean increased use of cars to access a range of services such as doctors (the nearest is in Ashley), secondary schools, no direct bus to a hospital, supermarkets and other shops are also not readily accessible by public transport. This means that the inclusion of this site contravenes the NPPF 2023. Loggerheads also has extremely limited access to jobs by public transport and few employment opportunities in the village itself. The bus service is infrequent and only runs between Hanley, Newcastle and Market Drayton. There are no direct links between other main towns e.g. Stafford, Crewe and Telford. Evidence considered by the Planning Committee in February 2024 ruled decisively that this location was unsustainable and contrary to NPPF 2023.</p> <p>2 LW53 is currently under cultivation and has had continuous use as agricultural land for many years. The development of this site would result in the loss of best and versatile agricultural land which contravenes paragraph 180 of the NPPOF2023. The Planning Committee, in February 2024, gave this as a reason for refusing to allow housing on this site. The selection of this greenfield site for housing is also against the stated national policy of this Labour government to prioritise brownfield and "grey field sites". I listened to a Labour spokesperson on Radio 4 immediately after this year's general election pledging that anyone who looked out on greenfields would not see them built on. Obviously this spokesperson has not read the Newcastle Borough Local Plan nor seen the number of agricultural fields surrounding the Loggerheads village which have already been covered in houses over the past few years.</p> <p>3 The council also acknowledged in their decision to refuse planning permission, the existence of a Grade II listed building adjacent to the site as housing development nearby, they considered would harm this heritage asset in contradiction to the aims and objectives of the National Planning Policy Framework 2023. Additionally, they ruled that the development of a housing estate on LW53 would adversely affect the rural nature of the area again in contravention of the National Planning Policy Framework 2023.</p> <p>4 The Council has not provided any figures to justify why Loggerheads needs to expand by 450 dwellings. 3 other rural centres have a target of 250 dwellings on the Local Plan. The draft plan suggests that Loggerheads NEEDS these dwellings but no reasons are given for this statement (Page 127 of the Draft Plan). There is no reason why Loggerheads should bear more than its share of new housing when already current and ongoing developments offer a range of housing including affordable and bungalows to meet the needs of a range of population. To meet the condition of, "soundness", the Local I Plan should remove the LW53 site as a site for future housing and also remove the increase of 450 houses for which no justification has been given and which is excessive compared to other rural centres.</p>
<b>Q7 Modification</b>	To meet the condition of, "soundness", the Local I Plan should remove the LW53 site as a site for future housing and also remove the increase of 450 houses for which no justification has been given and which is excessive compared to other rural centres.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP54
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Wilson
<b>Consultee Given Name</b>	Angela H
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I wish to comment on the Regulation 19 Draft Local Olan for the Borough of Newcastle under Lyme. With reference to page 129 "Policy LW53 Land at Corner of Mucklestone Wood Lane". I consider that the

	<p>inclusion of this land for future housing development is both unacceptable and extremely puzzling and also not compatible with the current National Planning Framework 2023 (the NPPF2023). I also challenge the plan on the grounds that numbers within this Policy have not been justified – “Distribution of Development PSD3 -page 16 of the draft plan. Development here (LW53) would be unsustainable. This was endorsed unanimously by the council's Planning Committee on 27th February 2024 when outline planning permission for housing development was refused on this site. Reasons given at this meeting include the following:</p> <p>1 Lack of supporting infrastructure in general: very limited public transport which would mean increased use of cars to access a range of services such as doctors (the nearest is in Ashley), secondary schools, no direct bus to a hospital, supermarkets and other shops are also not readily accessible by public transport. This means that the inclusion of this site contravenes the NPPF 2023. Loggerheads also has extremely limited access to jobs by public transport and few employment opportunities in the village itself. The bus service is infrequent and only runs between Hanley, Newcastle and Market Drayton. There are no direct links between other main towns e.g. Stafford, Crewe and Telford. Evidence considered by the Planning Committee in February 2024 ruled decisively that this location was unsustainable and contrary to NPPF 2023.</p> <p>2 LW53 is currently under cultivation and has had continuous use as agricultural land for many years. The development of this site would result in the loss of best and versatile agricultural land which contravenes paragraph 180 of the NPPOF2023. The Planning Committee, in February 2024, gave this as a reason for refusing to allow housing on this site. The selection of this greenfield site for housing is also against the stated national policy of this Labour government to prioritise brownfield and “grey field sites”. I listened to a Labour spokesperson on Radio 4 immediately after this year's general election pledging that anyone who looked out on greenfields would not see them built on. Obviously this spokesperson has not read the Newcastle Borough Local Plan nor seen the number of agricultural fields surrounding the Loggerheads village which have already been covered in houses over the past few years.</p> <p>3 The council also acknowledged in their decision to refuse planning permission, the existence of a Grade II listed building adjacent to the site as housing development nearby, they considered would harm this heritage asset in contradiction to the aims and objectives of the National Planning Policy Framework 2023. Additionally, they ruled that the development of a housing estate on LW53 would adversely affect the rural nature of the area again in contravention of the National Planning Policy Framework 2023.</p> <p>4 The Council has not provided any figures to justify why Loggerheads needs to expand by 450 dwellings. 3 other rural centres have a target of 250 dwellings on the Local Plan. The draft plan suggests that Loggerheads NEEDS these dwellings but no reasons are given for this statement (Page 127 of the Draft Plan) . There is no reason why Loggerheads should bear more than its share of new housing when already current and ongoing developments offer a range of housing including affordable and bungalows to meet the needs of a range of population. To meet the condition of, “soundness”, the Local I Plan should remove the LW53 site as a site for future housing and also remove the increase of 450 houses for which no justification has been given and which is excessive compared to other rural centres.</p>
<b>Q7 Modification</b>	To meet the condition of, “soundness”, the Local I Plan should remove the LW53 site as a site for future housing and also remove the increase of 450 houses for which no justification has been given and which is excessive compared to other rural centres.
<b>Q8 Hearing attendance</b>	Yes, I wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP162
<b>Order</b>	191
<b>Title</b>	Policy LW53 Land at Corner of Mucklestone Wood Lane, Loggerheads
<b>Consultee Family Name</b>	Wilson
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>Dear Sir / Madam.</p> <p>I am writing to express my opinion on the Regulation 19 Draft Local Plan for Newcastle under Lyme borough.</p> <p>With reference to page 129, "Policy LW53 Land at Corner of Mucklestone Wood Lane". The inclusion of this land for future housing development is unacceptable. The borough council's Planning Committee (meeting on 27 February 2024) unanimously rejected the developer's proposal to build houses there on grounds of sustainability. The reasons given at this meeting were:</p> <p>A lack of supporting infrastructure. There is very limited public transport, which would lead to a significant increase in the use of private cars in order to access schools, colleges, hospitals, doctors and dentists; there is one GP surgery and one primary school, both of which would be unable to cope with a significant further rise in population. Access to shopping and leisure facilities would similarly entail a significant increase in private road transport. This would be in contravention of NPPF 2023. Furthermore, if such development were to be permitted, the access road, Mucklestone Wood Lane, would be completely unable to cope with the extra road (work, school, leisure, shopping) traffic generated.</p> <p>Loggerheads has very limited access to employment by public transport; the infrequent Arriva bus service serves only Market Drayton, Newcastle and Hanley – there are no bus services to Stafford, Crewe or other employment centres. There are very few employment opportunities within the village itself.</p> <p>Site LW53 is agricultural land, currently under cultivation. It has been in continuous use as such for many years. The loss of good agricultural land would contravene para. 180 of NPPF 2023. The Planning Committee in February 2024 gave this as one of the reasons for rejection of the developer's proposal. The selection for housing development of this greenfield site is against the Labour Government's stated policy of prioritising development of brownfield and "grey" field sites, and not on agricultural land.</p> <p>In rejecting the proposal in February, the Planning Committee pointed to the existence of a Grade II listed building adjacent to the site. A housing development so close to the building would vitiate this heritage asset, in contradiction to the aims and objectives of the National Planning Framework 2023. Furthermore, the Planning Committee accepted that the development of site LW53 would adversely affect the rural nature of the area which is again in contradiction of the National Planning Framework 2023.</p> <p>The Borough Council has not provided any justification for why Loggerheads needs to expand by 450 houses – three other rural centres have a target of 250 houses/dwellings on the Local Plan. Loggerheads, it seems, is a location with the least suitable infrastructure being targeted with the biggest number of houses. The draft plan suggests that Loggerheads needs these dwellings, but no reasons for this are given. Loggerheads has already more than fulfilled its share of new housing, without any upgrades in infrastructure. The sluggish sales of the new builds should also be taken into consideration.</p> <p>In order to meet the criterion of "soundness", the Local Plan should withdraw site LW53 as a location for further housing development, as well as removing the arbitrary target of 450 houses. No justification has been given for this figure; it smacks of Soviet-style planning where arbitrary targets are handed down, leading to arbitrary and mistaken decisions, to the detriment of all concerned – except the developers.</p> <p>Yours truly, Keith Wilson</p>
<b>Comment ID</b>	NULLP163
<b>Order</b>	26
<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Wilson
<b>Consultee Given Name</b>	Keith
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	LW53
<b>Q6 Details</b>	<p>The Borough Council has not provided any justification for why Loggerheads needs to expand by 450 houses – three other rural centres have a target of 250 houses/dwellings on the Local Plan. Loggerheads, it seems, is a location with the least suitable infrastructure being targeted with the biggest number of houses. The draft plan suggests that Loggerheads needs these dwellings, but no reasons for this are given. Loggerheads has already more than fulfilled its share of new housing, without any upgrades in infrastructure. The sluggish sales of the new builds should also be taken into consideration.</p>

In order to meet the criterion of “soundness”, the Local Plan should withdraw site LW53 as a location for further housing development, as well as removing the arbitrary target of 450 houses. No justification has been given for this figure; it smacks of Soviet-style planning where arbitrary targets are handed down, leading to arbitrary and mistaken decisions, to the detriment of all concerned – except the developers.

Yours truly,

Keith Wilson

<b>Comment ID</b>	NULLP919
<b>Order</b>	58
<b>Title</b>	Policy HOU8: Rural and First Homes Exception Sites
<b>Consultee Family Name</b>	Windmill
<b>Consultee Given Name</b>	Paul
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	7.60 – 7.65
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>It would generally also be expected that the local housing need assessment (LHNA) undertaken to support the release of the land for development should identify any market housing need (as well as affordable/social housing).</p> <p>Often the market housing delivered is for older people specifically to enable them to downsize and is supported by the evidence provided in the LHNA.</p> <p>It's clear this Plan was drawn up with specific regard to affordable housing policy in the current NPPF that focuses on the delivery of First Homes. However, the draft proposed NPPF recognises that this focus is disproportionate and recommends authorities have regard to a mix of tenures.</p> <p>First Homes do meet certain, small need, they are not strictly affordable and prevent applicants from providing a greater proportion of social rented homes. The priority in the policy seems to be an unjustified emphasis on a particular niche housing product rather than for evidenced local need.</p> <p>The Policy is considered to be generally sound. However, in combination the issues raised above are considered to make the policy potentially unsound. It is suggested that this, and other parts of the Plan, should be considered under the NPPF in force at a specific date before the Examination.</p>
<b>Q7 Modification</b>	<p>Add an additional clause after existing clause g under part 1 of Policy HOU8 to read:</p> <p>h. If the survey and assessment indicates a need for First Homes these may be included providing that:-</p> <ul style="list-style-type: none"> <li>• the homes will remain first homes in perpetuity;</li> <li>• the first homes provided are occupied by first-time buyers who meet the local connection test;</li> </ul> <p>Remove the following from the policy:</p> <p>2. In addition to the requirements above, proposals for first homes exception sites will be permitted where the following criteria are met: a. the proposed development is located on unallocated land outside the Green Belt;</p> <p>b. Where a proposal also includes other forms of affordable housing, there must be evidence of local need and that it would assist with viability of the sustainability of the scheme. Applicants may alter the proportions of affordable housing to include small quantities (up to 25%) of other affordable housing products;</p> <p>Remove the phrase "and First Home" from paragraph 7.64. The new sentence should read:</p> <p>This policy recognises that and enables affordable housing on Rural Exception Sites to be cross subsidised from the sale of market homes where, without this element of market housing, the site would not come forward for affordable housing.</p> <p>Delete paragraph 7.65 and replace it with the following text:</p> <p>7.65 Affordable housing is to be of a good standard of design and layout, in keeping with the character of the settlement that it adjoins. Any market housing is to be similar so that the tenures are not distinguishable.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)



Comment ID	NULLP341
Order	21
Title	Policy PSD1: Overall Development Strategy
Consultee Family Name	Withington
Consultee Given Name	Clare
Q4 Part of document	Policy
Q4 Policy	PSD1
Q5 Legally compliant	No
Q5 Sound	No
Q5 DTC compliant	No
Q6 Details	<p>The growth targets and projections are very confusing and misleading.</p> <p>In the Issues and Option Stage - 3 clear growth options were given. There was majority support for <b>Option 1 – national minimum, standard methodology target - equating to 7000 homes and need for 46ha employment land (noting that there was already a supply of 64ha providing a surplus of land).</b></p> <p>However this later changed in the First Draft Local Plan Reg 18 to :</p> <p>Policy PSD 1: Overall Development Strategy</p> <ol style="list-style-type: none"> <li>1. A <b>minimum of 7,160</b> dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 358 dwellings per annum.</li> <li>2. Provision will be made for a minimum of 69 hectares of employment land to support the local economy. The <b>existing employment land supply of around 50 hectares</b> will be allocated to secure its future use. <b>(Noting a further 19 hectares was required)</b></li> </ol> <p>In the Final Draft Local Plan Reg 19 this is now:</p> <p>Policy PSD 1: Overall Development Strategy</p> <ol style="list-style-type: none"> <li>1 A <b>minimum of 8,000</b> dwellings will be delivered in the Borough over the Plan period 2020 – 2040 which equates to 400 dwellings per annum.</li> <li>2 Provision will be made for a <b>minimum of 63 hectares</b> of employment land over the Plan period 2020 – 2040</li> </ol> <p>It states page 19 Reg 19 Draft Plan "The economic growth scenario applied in the Local Plan is informed by the latest Cambridge Econometrics (March 2023) and Experian (December 2023) economic forecasts for Newcastle-under-Lyme for the period 2023-2040. The economic forecast identifies jobs growth of approximately 237 per annum over the plan period. To meet projected growth in the Borough there is a need to provide for a minimum of <b>63 hectares of employment land.</b>"</p> <p>However with AB2A total site allocation of 80ha (previously 69ha) which includes <b>22 ha</b> of employment land (the other 58 ha removed from green belt for ancillary uses to support the employment), plus KL15 of <b>11 ha</b> of employment land - this takes the figure up to <b>96 ha</b> - in addition to the existing supply of 64 ha identified.</p> <p>If you take into account the total amount of land allocated for employment/ancillary uses this is a total of <b>155 ha</b> in the Local Plan. <b>(64 ha existing land supply plus Green belt sites of 80 ha for AB2a and 11 ha for KL15)</b></p> <p>If there is already enough employment land to meet the 63 ha required from the existing supply as suggested at page 19 - why do we need to further add in AB2A and KL15? Also why is there no figure to measure the policy against which determines the total amount of employment land with AB2A and KL15 included? I find this very <b>ambiguous and misleading</b> especially as it states these targets are minimums with no upper limit set ? Also it seems the evidence base seems to adjust to suit ... although the end result is still in conflict between the need and the proposed allocation.</p>
Q7 Modification	Remove AB2A from the Plan to reduce the amount of land being taken from Green Belt unnecessarily.

Comment ID	NULLP342
Order	66
Number	8
Title	Employment
Consultee Family Name	Withington
Consultee Given Name	Clare
Q4 Part of document	Policy
Q5 Legally compliant	No
Q5 Sound	No
Q6 Details	AB2/A should be removed.

	<p>It was stated in earlier site assessments carried out that the AB2 site had boundaries which are a mix of durable and non durable boundaries. Clearly these would stop any further development in the future due to the weakness of the non durable boundaries, and making it high risk of further encroachment? We have already seen the effect of this when AB2 became AB2A and suddenly expanded with an extra 20 odd hectares taken out of green belt over night - to extend it beyond the original boundary provides even more encroachment into the green belt that originally felt possible? I feel this site will put the surrounding green belt at risk as once developed it will be hard to defend any further encroachment. This includes the green belt the other side of the M6. Therefore removal of this site from Green Belt (which is already acknowledged as being disconnected from the villages) will severely leave the surrounding green belt vulnerable to even more incursion.</p> <p>In 2022 officers assessed AB2 as being unsuitable for Employment and Housing. However it would seem that since then evidence has been reviewed several times, to suit and amended to in order to get the scheme to fit any exceptional circumstances which they believe exist. See attached - <b>Newcastle under Lyme Strategic Housing &amp; Employment Land Availability Assessment 2022 Appendix 4 Site Assessment Proformas - Sites not in Deliverable &amp; Developable Supply</b>. This is all very confusing for the public and really doesn't give us much faith in the officers or the experts' opinions.</p> <p>The Heritage assessment within the evidence base states "Where possible existing hedgerows and trees should be preserved to help to preserve the pattern of enclosure within the site and would help retain the site's neutral contribution to heritage assets within its environs". However St Modwens (site developer) in their response at Issues and Options have already confirmed they will remove the hedgerows - "The loss of hedgerow connectivity would be replaced by more substantial green links through and around the Site." It is clear the developer will not be looking to preserve (and potentially may be impossible due to site functionality) any of the local important heritage features which will be lost as a result.</p>
<b>Q7 Modification</b>	Removal of AB2/A which (for context only) if it were residential (as an example) would be a development of around 2400 homes in a parish with a council tax base of 2600! This is such a large incursion in one Parish it is unfathomable.
<b>Q10 File 1</b>	6387467
<b>Attachments</b>	<a href="#">Appendix 4. Site Proformas Not Deliverable and Developable.pdf</a>
<b>Comment ID</b>	NULLP339
<b>Order</b>	266
<b>Title</b>	Appendix 5: Design Code for Historic Farmsteads
<b>Consultee Family Name</b>	Withington
<b>Consultee Given Name</b>	Clare
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	The proposed site allocation of AB2/AB2a is in direct conflict with this policy - as the site contains an old farmstead Brook Farm which will be destroyed if the site allocation is progressed (ref Other heritage assets within the site include the site of an 18th century farmstead, Brook Farm (MST21176)).
<b>Q7 Modification</b>	Remove AB2/AB2a and preserve the Historic Farmstead
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP340
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Withington
<b>Consultee Given Name</b>	Clare
<b>Q4 Part of document</b>	Paragraph
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The consultation is not meaningful and is flawed as it doesn't comply with Gunning principles.</p> <ul style="list-style-type: none"> <li>• <b>Gunning Principle 2:</b> Sufficient information needs to be supplied for the public to give the consultation 'intelligent consideration'.</li> <li>• <b>Gunning Principle 3:</b> There needs to be an adequate time for the consultees to consider the proposal and respond.</li> </ul> <p>Issues and Options consultation - The first lot of posters put up specifically precluded the option for people to write in either by post or email – and only provided details to make comments via portal "The document is available to view and respond to online at <a href="http://www.consult.newcastle-staffs.gov.uk">www.consult.newcastle-staffs.gov.uk</a>". When it was extended the next poster did not allow emails to be considered.</p>

*"Responding - We kindly ask that all representations are made online via the link above. Representations to our email inbox will not be accepted. If you do not have access to the internet, you can submit your comments by post to: ....."*

In the earlier consultations there were problems with people being able to access the portal (people couldn't register or download the document due to IT issues - also the portal timed out after a short period of time meaning responses were lost and also cut short due to a character (not word!) limit!). There were missing documents from the evidence base which were uploaded part way through the consultation – this also resulted in the Issues and Options consultation being extended from deadline of 13th December 21 to 24th January 2022 following missing out Betley (a rural service centre) totally out of the Issues and Options document.

In earlier iterations of the Local Plan the AB2 site boundary and plan were not included within the Issues and Options Plan, it was just marked by a star on a map (along with Keele Strategic employment site). It was only through interrogating the officers that a meaningful development plan for AB2 showing the proposed boundary (69 ha) was obtained and circulated by the Parish Council (not the Borough) to allow people to properly comment. At that stage they didn't think it was needed as it was just a proposal not a site allocation... so how could people comment meaningfully at that stage?

- **Gunning Principle 4:** Conscientious consideration must be given to the consultation responses before decisions are made.

Earlier consultations responses have not been taken into consideration - and there is no clear audit trail to show how these have been considered and why they have not been taken into account.

There have been two officer reports considered by Cabinet regarding the consultation outcomes :

#### **1) The Cabinet report 19 July 2022 on Consultation response to Local Plan Issues and Options.**

This report provides an officer's summary (only) of the issues raised with percentages showing for and against. It does not set out how the Issues and Options consultation response has been considered during the production of the First and Final Draft Local Plan. However it is clear that no views on the Growth Strategy for Housing and Employment have been taken into consideration:

In the Issues and Option Stage views given were for a majority support for **Option 1 – national minimum, standard methodology target - equating to 7000 homes and need for 46ha employment land (noting that there was already a supply of 64ha providing a surplus of land).**

In the First Draft Local Plan this was set out as :

Policy PSD 1: Overall Development Strategy

1. A **minimum of 7,160** dwellings will be delivered in the Borough over the Plan period 2020-2040 which equates to 358 dwellings per annum.
2. Provision will be made for a minimum of 69 hectares of employment land to support the local economy. The **existing employment land supply of around 50 hectares** will be allocated to secure its future use. *(Noting a further 19 hectares was required)*

In the Final Draft Local Plan this is now:

Policy PSD 1: Overall Development Strategy

- 1 A **minimum of 8,000** dwellings will be delivered in the Borough over the Plan period 2020 – 2040 which equates to 400 dwellings per annum.
- 2 Provision will be made for a **minimum** of 63 hectares of employment land over the Plan period 2020 – 2040.

These are minimums with no upper limit set?

This clearly discounts the views of the previous consultations and also evidence base.

In the Issues and Options consultation it was stated that the **63 ha** minimum of employment land in the Final Draft (according to earlier draft versions) could be met from an existing land supply of 64ha. However in the Final Draft with AB2A total site allocation of 80ha (previously 69ha) which includes **22 ha** of employment land (the other 58 ha removed from green belt for ancillary uses to support the employment), plus KL15 of **11 ha** of employment land - this takes the figure up to **96 ha**.

If you take into account the total amount of land allocated for employment/ancillary uses this is a total of **155 ha** in the Local Plan. **(64 ha existing land supply plus 80 ha for AB2a and 11 ha for KL15)**

At Issues and Option Stage, the Officer's report notes the majority objection to the inclusion of AB2. In addition two petitions were submitted to the Borough Council; one containing 294 signatures, with the other containing 1376 signatures. Both of these petitions were in response to Question 18 of the Issues and Strategic Options document; "should site AB2 – Land south east of Junction 16 be considered for Green Belt release?" A further 757 identical letters with regard to the same issue were submitted to the Borough Council in response to the consultation.

The petitions & letters combined with the representations made via the consultation portal give a total of 6076 comments made on the Newcastle-under-Lyme Local Plan Issues and Strategic Options Consultation

#### **2) The Cabinet report Janary 2024 on Consultation reponse to the First Draft Local Plan.**

The officers report from Jan 2024 summarises a lot of points and provides an officer's view (biased?) considered by members when making a decision to move the plan forward. In almost all responses the officer provides one or two paragraphs of a generic response to a raft of issues raised rather than addressing each valid point individually. Most are responded to with the same standard approach...

*"The council will review the policy wording and approach in the light of consultation responses received"* - which appears throughout the document as a standard response.

A further petition requesting a review of the Council's housing targets - with approx 1850 signatures on the online petition was submitted.

	Despite all of the above the housing numbers have grown to a minimum of 8000 and the AB2 site is now even larger from 69 ha to 80 ha . All of which exceeds Turley's Employment Need Assessment in 2020 which stated that employment land was needed to support that growth of 8000 approx was 52.6ha, although the current supply was 64.8ha - for <i>Growth Option 2: Sustainable growth target (Experian baseline)</i> - <i>Plan for a housing target which aligns with projections for economic growth (Experian model projections)</i>
<b>Q7 Modification</b>	Lisen to the views of the people of Newcastle under Lyme and remove the excessive amount of land to be taken from the Green Belt through AB2 and instead look to achieve the national minimum - standard methodology target for both housing and employment.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP432
<b>Order</b>	13
<b>Number</b>	3
<b>Title</b>	Context
<b>Consultee Family Name</b>	Withington
<b>Consultee Given Name</b>	Clare
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	Duty to co-operate is not sound:  The views of Cheshire East and Stoke on Trent City Council in the Duty to Co-operate should have been fully obtained and considered on the proposed Final Draft Local Plan before it went through to Reg 19 consultation.
<b>Comment ID</b>	NULLP431
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Withington
<b>Consultee Given Name</b>	Clare
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Why has no document considered the cumulative impact of the loss of all the following sites from the Green Belt. The amount of Green Belt amendment in this Local plan is far more than just a bit of rounding off or tweaking of the edges of villages etc or using the weakest performing sites first ... the overall impact on the northern part of the Borough needs to be fully assessed as the cumulative impact will weaken the remaining green belt which most likely will be easy pickings for the next round of Local plan development. Surely this should be standard practice and a logical step to take a step back and look at the overall impact on the Borough's Green Belt plus also the neighbouring authorities Green Belt as well as part of the consideration - as if both Cheshire East and Newcastle nibble away at it - it will be meeting in the middle! The views of Cheshire East and Stoke on Trent City Council in the Duty to Co operate should have been fully obtained and considered on the proposed Final Draft Local Plan before it went through to Reg 19 consultation.</p> <p>AB2 Land at Junction 16 of the M6;  AB12 Land east of Diglake Street;  AB15 Land north of Vernon Avenue;  AB33 Land off Nantwich Road / Park Lane;  CT1 Land off Red Street and High Carr Farm;  KL15 Land south of A525 Keele;  NC13 Land west of Bullockhouse Road;  SP11 Lyme Park, Silverdale;  SP23 Land at Cemetery Road / Park Road;  BL18 Land at Clough Hall;  TK10 Land at Crown Bank, Talke;  TK17 Land off St Martins Road;  TK27 Land off Coppice Road;  TB19 Land South of Newcastle Golf Club.</p>

<b>Comment ID</b>	NULLP434
<b>Order</b>	66
<b>Number</b>	8
<b>Title</b>	Employment
<b>Consultee Family Name</b>	Withington
<b>Consultee Given Name</b>	Simon
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Legally compliant</b>	No
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	I object to the inclusion of AB2/AB2A. I wish my earlier comments to be considered in full and would request that all other comments are considered in full from earlier consultations. I find the evidence base (which has now been replaced with other documents and the earlier ones removed) confusing as there are mixed messages. Most of the development is centred in the north of the borough and there is not an even distribution of employment across the borough.
<b>Q7 Modification</b>	Removal of AB2/AB2A from the plan.

<b>Comment ID</b>	NULLP277
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Many factors that should limit building on AB12 are also relevant to AB15. Other factors specific to AB15 are listed below.</p> <p>Item 4: States that structures will not significantly block views of the surrounding area is erroneous as properties which back onto Barleyfields and Chester Road will have their view obstructed.</p> <p>Item 9: The prospective financial contributions will be unlikely to fund improvements to school and health facilities and extra traffic will make congested roads, noise and pollution and health problems worse.</p> <p>Paragraph 13:39: the risk of flooding to farm buildings and properties to the northwest of the site will be exacerbated due to building on green fields because of run-off.</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will to be sufficient to render AB2, AB12, AB15 and AB33 unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP282
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Many factors limiting the justification of AB12 apply equally well to AB33, which may limit its justification are shown below.</p> <p>Item 7: Flooding cannot be mitigated by the concentrating development on the areas of least risk as most of the area is flat and low lying. This means that apart from a rise of 10 meters towards the eastern boundary of the site, most of the site is at risk of flooding which will be exacerbated by climate change.</p> <p>Item 11: States that there will be a need for contributions to increase the capacity of local schools and health services but with no specifics to show how these will be applied.</p> <p>Paragraph 13:43: Implies that the flood risk can be addressed but there is nothing specifically stated where the drainage will be routed or flow capacity required. As the site has low gradients the required storm drain cross sections are likely to be larger than normal. Moreover, if this site is developed flooding will be exacerbated by the neighboring AB2 employment site. This is a limiting factor on the effectiveness of the development.</p> <p>It seems that NULBC are ill informed of the sites continued use as cattle are often seen grazing there as it is an open green space with commercial agricultural value which backs onto the properties at the eastern boundary.</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely</p>



	urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will be sufficient to render AB2, AB12, AB15 and AB33 unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP286
<b>Order</b>	153
<b>Title</b>	Policy AB33 Land off Nantwich Road / Park Lane, Audley
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB33
<b>Q6 Details</b>	<p>This is my objection to the proposed draft local plan for the area of Audley Parish and many more in surrounding areas. In writing this response, I am aware of the alleged need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. In writing this I am indebted to the objection document submitted by Dr. J. C. Austin for his invaluable research and relevant information for an objection on a wider scale but nevertheless relevant to the local area. As he states the democratic control referred to by the council seems to be a "symptom of the subsection in the NPPF titled "The presumption in favour of sustainable development" (paragraphs 11-14)", I totally agree with him that to residents it seems that "this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed", and "seems to be a commitment to eventual development even if it is not needed", which is extremely worrying on many levels for the community. These proposed new developments would, in the view of many residents, have a devastating impact on our rural area, which is part of the Designated Conservation Area of Audley (1976, information listed on the Council's Local Plan 2011).</p> <p>In particular, I believe it would result in the following problems:</p> <ul style="list-style-type: none"> <li>• Loss of light or overshadowing</li> <li>• Increased risk of flooding due to 'run-off' (there is already some flooding in the area)</li> <li>• Loss of visual amenity</li> <li>• Limitations to physical activity (There are many public footpaths in the area, cyclists, horseriders etc. all use the area on a regular basis)</li> <li>• Generation of extra traffic, overloading already busy local roads resulting in extra noise, pollution, disturbance and danger to humans, livestock and wildlife.</li> <li>• Loss of trees and other biodiversity – bats, lizards, newts etc.</li> <li>• Loss of natural carbon capture</li> <li>• Decrease in food production capacity, look at the current threat posed by the reduction of grain from Ukraine and the shortages created by the recent COVID Lockdown for example. We need to grow more of our own food, not destroy prime farmland and rely on imports. Sustainability here is the key message!</li> <li>• Increased local population placing further pressure on local schools, GP's surgeries (the one in Audley has already stated that it will be unable to cope), dentists and other services which are already oversubscribed.</li> </ul> <p>As Dr. Austin has stated there appears to be an "overdevelopment which threatens nature and the already depleted biodiversity we see in this country". This is true both nationally and locally and the local populous feel that their opinions are disregarded on all political levels and by politicians of any political persuasion. It has been stated on national television that a large proportion of younger people and children are very worried about the effects of climate change and identifying areas of green belt to be built on will only enhance the problem. Allowing developers to destroy existing farmland, green spaces and mature woodland is short-sighted to say the least, it takes decades for a habitat to establish itself and support wildlife and replacing these with saplings will not solve the problem, therefore these proposals cannot be regarded as sustainable development at all. Do we really need all these new houses to combat the so-called housing shortage or is it really, as Dr. Austin states, "little more than a myth propagated by the construction industry and related interests"?</p> <p>Therefore, I agree with his analysis that "locally there are strong grounds for objections to development of the sites"</p> <ul style="list-style-type: none"> <li>• AB12(p74)</li> <li>• AB15(p75)</li> <li>• AB32(p75)</li> <li>• AB33(p75).</li> </ul> <p>Furthermore, I agree with Dr. Austin when he says that "both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors". As he has pointed out the commercial developments mooted for the AB2 and TK30 sites locally are not needed and I believe that the developers normal cry of "it will create jobs" is misleading to say the least and proposes far more land use than the councils own recently published assessment document of housing and economic needs suggests! Would the council please explain why they are intending to ignore their own document! Moreover, the proposal seems to be mainly for agricultural land, which once lost</p>

	<p>would be virtually impossible to recover. We need to be more sustainable in feeding ourselves and not relying on overseas imports whether they are from Europe or the wider world. It should also be noted that the country, as a whole, needs to stop foreign investing in building homes which the local populous can neither afford to buy or rent (there are countries in the world which will not allow non-native individuals/companies from buying/building houses – Thailand is a case in point). This would certainly enhance the prospects for affordable homes.</p> <p>In summary, I would like to ask the council, and the government would they really like to be remembered as the politicians who made the local area and the UK as a whole a 'concrete wasteland'?</p>
<b>Comment ID</b>	NULLP278
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The site has limited access especially considering the large size of construction vehicles. There is no access from Great Oak Road and the only access points are from Diglake Street and a farm track next to 104 Ravens Lane. The track from Ravens Lane is only 4,3 meters wide and is limited by the boundaries of the properties on either side, which make it impractical for construction or emergency vehicles. The potential access at the bottom of Diglake Street is approximately 20 meters wide. The street it is heavily congested with residents cars which are forced to park on either side of the street making access virtually impossible. The construction of a new estate may require the demolition of existing properties to gain access from Diglake Street or the purchase of land from the properties either side of the track off Ravens Lane. It is relevant to note that Ravens Lane also has a high level of traffic and in some areas residents have to park on both sides of the road as it has a large number of terraced houses. Given these issues AB12 is undeliverable and ineffective.</p> <p>Notes on general housing need:</p> <p>The points below also apply to the AB15 and AB33 all of which are unsound as far as the Local Plan is considered.</p> <p>The perceived population growth in the Borough for the period 2023-2040 is quoted as 5,460 in the Housing and Economics Needs Assessment Update (ED001, April 2024), given the average number per household of 2.4 these can be accommodated in 2,275 new dwellings. This means that annually we will only need 134 new homes per annum. However, the 'standard method' states that 347 houses will be needed which is based on the 2014 population projections. These figures are based on the 2011-2021 census, invalidating the 2014 projections as the population within the Borough has decreased by 0.5% and this downward pressure may also be reflected nationally given the new Labour Governments election pledge. If a modest growth is called for it should be on Brownfield sites first and use sites that have already been purchased, some have even got footings already in place and left (Land Banking). Like AB2 this would make building on AB12 and other green belt/ green field sites unnecessary.</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will be sufficient to render AB2, AB12, AB15 and AB33 unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP283
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2

<b>Q6 Details</b>	<p>Newcastle under Lyme draft local plan – regulation 18: Consultation response</p> <p>Dear Sir/Madam,</p> <p>This is my objection to the proposed draft local plan for the area of Audley Parish and many more in surrounding areas. In writing this response, I am aware of the alleged need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. In writing this I am indebted to the objection document submitted by Dr. J. C. Austin for his invaluable research and relevant information for an objection on a wider scale but nevertheless relevant to the local area. As he states the democratic control referred to by the council seems to be a “symptom of the subsection in the NPPF titled “The presumption in favour of sustainable development” (paragraphs 11-14)”, I totally agree with him that to residents it seems that “this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed”, and “seems to be a commitment to eventual development even if it is not needed”, which is extremely worrying on many levels for the community. These proposed new developments would, in the view of many residents, have a devastating impact on our rural area, which is part of the Designated Conservation Area of Audley (1976, information listed on the Council's Local Plan 2011).</p> <p>In particular, I believe it would result in the following problems:</p> <ul style="list-style-type: none"> <li>• Loss of light or overshadowing</li> <li>• Increased risk of flooding due to ‘run-off’ (there is already some flooding in the area)</li> <li>• Loss of visual amenity</li> <li>• Limitations to physical activity (There are many public footpaths in the area, cyclists, horseriders etc. all use the area on a regular basis)</li> <li>• Generation of extra traffic, overloading already busy local roads resulting in extra noise, pollution, disturbance and danger to humans, livestock and wildlife.</li> <li>• Loss of trees and other biodiversity – bats, lizards, newts etc.</li> <li>• Loss of natural carbon capture</li> <li>• Decrease in food production capacity, look at the current threat posed by the reduction of grain from Ukraine and the shortages created by the recent COVID Lockdown for example. We need to grow more of our own food, not destroy prime farmland and rely on imports. Sustainability here is the key message!</li> <li>• Increased local population placing further pressure on local schools, GP's surgeries (the one in Audley has already stated that it will be unable to cope), dentists and other services which are already oversubscribed.</li> </ul> <p>As Dr. Austin has stated there appears to be an “overdevelopment which threatens nature and the already depleted biodiversity we see in this country”. This is true both nationally and locally and the local populous feel that their opinions are disregarded on all political levels and by politicians of any political persuasion. It has been stated on national television that a large proportion of younger people and children are very worried about the effects of climate change and identifying areas of green belt to be built on will only enhance the problem. Allowing developers to destroy existing farmland, green spaces and mature woodland is short-sighted to say the least, it takes decades for a habitat to establish itself and support wildlife and replacing these with saplings will not solve the problem, therefore these proposals cannot be regarded as sustainable development at all. Do we really need all these new houses to combat the so-called housing shortage or is it really, as Dr. Austin states, “little more than a myth propagated by the construction industry and related interests”?</p> <p>Therefore, I agree with his analysis that “locally there are strong grounds for objections to development of the sites”</p> <ul style="list-style-type: none"> <li>• AB12(p74)</li> <li>• AB15(p75)</li> <li>• AB32(p75)</li> <li>• AB33(p75).</li> </ul> <p>Furthermore, I agree with Dr. Austin when he says that “both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors”. As he has pointed out the commercial developments mooted for the AB2 and TK30 sites locally are not needed and I believe that the developers normal cry of “it will create jobs” is misleading to say the least and proposes far more land use than the councils own recently published assessment document of housing and economic needs suggests! Would the council please explain why they are intending to ignore their own document! Moreover, the proposal seems to be mainly for agricultural land, which once lost would be virtually impossible to recover. We need to be more sustainable in feeding ourselves and not relying on overseas imports whether they are from Europe or the wider world. It should also be noted that the country, as a whole, needs to stop foreign investing in building homes which the local populous can neither afford to buy or rent (there are countries in the world which will not allow non-native individuals/companies from buying/building houses – Thailand is a case in point). This would certainly enhance the prospects for affordable homes.</p> <p>In summary, I would like to ask the council, and the government would they really like to be remembered as the politicians who made the local area and the UK as a whole a ‘concrete wasteland’?</p>
<b>Comment ID</b>	NULLP279
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma

<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Notes on AB12</p> <p>Item 10: The proposal related to flooding risk and says that any run-off from the developed site will be towards Brierly Brook to the North, this however will affect the agricultural quality of the field immediately north of the site. Brierly Brook eventually finishes at the treatment plan on Alsager Road but it is unclear if it has the capacity to cope with any potential flash flooding from AB12</p> <p>Item 12: Will the financial cost of contributions for increased schools and health facilities be forthcoming from the Borough Council? Over recent years quite a few houses (i.e. Pump Court, Coalfield Close etc.) have already been built in the area with no extra funding being made available. These have already increased the traffic in the area which contributes to the road congestion, noise and pollution</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will be sufficient to render AB2, AB12, AB15 and AB33 unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP284
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>This is my objection to the proposed draft local plan for the area of Audley Parish and many more in surrounding areas. In writing this response, I am aware of the alleged need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. In writing this I am indebted to the objection document submitted by Dr. J. C. Austin for his invaluable research and relevant information for an objection on a wider scale but nevertheless relevant to the local area. As he states the democratic control referred to by the council seems to be a "symptom of the subsection in the NPPF titled "The presumption in favour of sustainable development" (paragraphs 11-14)", I totally agree with him that to residents it seems that "this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed", and "seems to be a commitment to eventual development even if it is not needed", which is extremely worrying on many levels for the community. These proposed new developments would, in the view of many residents, have a devastating impact on our rural area, which is part of the Designated Conservation Area of Audley (1976, information listed on the Council's Local Plan 2011).</p> <p>In particular, I believe it would result in the following problems:</p> <ul style="list-style-type: none"> <li>• Loss of light or overshadowing</li> <li>• Increased risk of flooding due to 'run-off' (there is already some flooding in the area)</li> <li>• Loss of visual amenity</li> <li>• Limitations to physical activity (There are many public footpaths in the area, cyclists, horseriders etc. all use the area on a regular basis)</li> <li>• Generation of extra traffic, overloading already busy local roads resulting in extra noise, pollution, disturbance and danger to humans, livestock and wildlife.</li> <li>• Loss of trees and other biodiversity – bats, lizards, newts etc.</li> <li>• Loss of natural carbon capture</li> <li>• Decrease in food production capacity, look at the current threat posed by the reduction of grain from Ukraine and the shortages created by the recent COVID Lockdown for example. We need to grow more of our own food, not destroy prime farmland and rely on imports. Sustainability here is the key message!</li> <li>• Increased local population placing further pressure on local schools, GP's surgeries (the one in Audley has already stated that it will be unable to cope), dentists and other services which are already oversubscribed.</li> </ul> <p>As Dr. Austin has stated there appears to be an "overdevelopment which threatens nature and the already depleted biodiversity we see in this country". This is true both nationally and locally and the local populous feel that their opinions are disregarded on all political levels and by politicians of any political persuasion. It has been stated on national television that a large proportion of younger people and children are very worried about the effects of</p>

climate change and identifying areas of green belt to be built on will only enhance the problem. Allowing developers to destroy existing farmland, green spaces and mature woodland is short-sighted to say the least, it takes decades for a habitat to establish itself and support wildlife and replacing these with saplings will not solve the problem, therefore these proposals cannot be regarded as sustainable development at all. Do we really need all these new houses to combat the so-called housing shortage or is it really, as Dr. Austin states, "little more than a myth propagated by the construction industry and related interests"? Therefore, I agree with his analysis that "locally there are strong grounds for objections to development of the sites"

- AB12(p74)
- AB15(p75)
- AB32(p75)
- AB33(p75).

Furthermore, I agree with Dr. Austin when he says that "both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors". As he has pointed out the commercial developments mooted for the AB2 and TK30 sites locally are not needed and I believe that the developers normal cry of "it will create jobs" is misleading to say the least and proposes far more land use than the councils own recently published assessment document of housing and economic needs suggests! Would the council please explain why they are intending to ignore their own document! Moreover, the proposal seems to be mainly for agricultural land, which once lost would be virtually impossible to recover. We need to be more sustainable in feeding ourselves and not relying on overseas imports whether they are from Europe or the wider world. It should also be noted that the country, as a whole, needs to stop foreign investing in building homes which the local populous can neither afford to buy or rent (there are countries in the world which will not allow non-native individuals/companies from buying/building houses – Thailand is a case in point). This would certainly enhance the prospects for affordable homes.

In summary, I would like to ask the council, and the government would they really like to be remembered as the politicians who made the local area and the UK as a whole a 'concrete wasteland'?

<b>Comment ID</b>	NULLP276
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>The plan is unjustified, ineffective and unsound. The borough previously claimed that it needed 22 hectares of land to comply with employment needs up to 2040 so does not need 80 hectares of good quality farmland (3a &amp; 3b) within the greenbelt. Its development of 63 hectares into sites of employment (Policy PSD1, item 2) would create a further need of 17 hectares to provide services such as a lorry park, substation and SuDS. There was no clear answer from the borough council when they were questioned and this means that they propose to consume 41 hectares of green belt land which for no perceptible reason that can be ascertained. Their proposal has been assessed by the planning consultant ARUP (ED008, page 28) who recommend that the site is excluded from the process as it impacted too heavily on the greenbelt.</p> <p>The site is also ineffective as it cannot be delivered during the period of the plan. Access to the M6 or the A500 would be problematical and would require an upgrade of Junction 16 and also of the A500 which are frequently both closed due to accidents or heavy traffic putting immense pressure on the alternative narrow roads surrounding the area. The site would generate extra heavy goods traffic which would create further pressure on these alternative roads. Emergency vehicles would have to access the site via the country roads which can only be accessed through Audley or other surrounding villages where the roads are heavily congested at many times of the day. The necessary upgrade of junction 16 is unlikely to occur during the plan period and indeed may never come to fruition given the low prospects of funding from Highways England and the £22billion shortfall highlighted by the new Labour Government. I would state that on these grounds the proposed site at AB2 is unsound.</p> <p>All of the allocations mentioned in this representation form part of a high growth strategy for which the Borough have provided no evidence that it will materialize.</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will be sufficient to render AB2, AB12, AB15 and AB33</p>



	unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP280
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB2
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>Notes on AB2</p> <p>Item 2: Safety issues of the possible new junction near to junction 16 of the M6 has not be adequately addressed given that accidents occur on a regular basis and often lead to the A500 being congested and also at risk of accidents occurring. Emergency access to these accidents via Barthomley Road or Park Lane is not really viable as these are accessed via single track country roads.</p> <p>Item 8: The noise and air quality mitigation is not addressed and absorption technology has not been mentioned. Certainly both of the issues will be increased by implementing the employment proposal on AB2.</p> <p>Item 10: I am very suspicious of the claim that the mature trees will be retained and enhanced, how is this possible?</p> <p>Item 14: The loss of biomass which includes vegetation and topsoil which allows for food production, the drawdown of carbon and other pollutant absorption is not mentioned as it is irreversible and is an example of 'greenwashing'. This is reason enough to remove this allocation.</p>
<b>Q7 Modification</b>	<p>The draft local plan proposed as transformation of Audley and Bignall End which is unjustified by local need. The lack of effectiveness and unjustified nature of AB2 weakens the reason for house building on local green belt parcels. Therefore, the proposed sites of AB2, AB12, AB15 and AB33 should be removed from the local plan.</p> <p>These proposals seem to go against paragraph 4.3 of the local plan which states it "will have respected and improved the character and distinctiveness of our market towns, villages and other rural areas" On the contrary, these proposals will destroy the rural village character of Audley and Bignall End, completely urbanizing the entire surrounding area. The local plan is therefore inconsistent. The majority of residents of Audley and Bignall End are strongly against these proposals and wish to see them removed from the local plan. It is hoped that the points made will to be sufficient to render AB2, AB12, AB15 and AB33 unsound as they are not justified or effective. I request that all the proposals should be removed from the local plan.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP285
<b>Order</b>	151
<b>Title</b>	Policy AB15 Land North of Vernon Avenue
<b>Consultee Family Name</b>	Wood
<b>Consultee Given Name</b>	Alma
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB15
<b>Q6 Details</b>	<p>This is my objection to the proposed draft local plan for the area of Audley Parish and many more in surrounding areas. In writing this response, I am aware of the alleged need to adopt a local plan in order for local authorities to maintain democratic control of development in the area. In writing this I am indebted to the objection document submitted by Dr. J. C. Austin for his invaluable research and relevant information for an objection on a wider scale but nevertheless relevant to the local area. As he states the democratic control referred to by the council seems to be a "symptom of the subsection in the NPPF titled "The presumption in favour of sustainable development" (paragraphs 11-14)", I totally agree with him that to residents it seems that "this gives the impression that local authorities must demonstrate a willingness to develop a particular area in order to avoid it being developed", and "seems to be a commitment to eventual development even if it is not needed", which is extremely worrying on many levels for the community. These proposed new developments would, in the view of many residents, have a devastating impact on our rural area, which is part of the Designated Conservation Area of Audley (1976, information listed on the Council's Local Plan 2011).</p> <p>In particular, I believe it would result in the following problems:</p> <ul style="list-style-type: none"> <li>• Loss of light or overshadowing</li> <li>• Increased risk of flooding due to 'run-off' (there is already some flooding in the area)</li> <li>• Loss of visual amenity</li> </ul>



- Limitations to physical activity (There are many public footpaths in the area, cyclists, horseriders etc. all use the area on a regular basis)
- Generation of extra traffic, overloading already busy local roads resulting in extra noise, pollution, disturbance and danger to humans, livestock and wildlife.
- Loss of trees and other biodiversity – bats, lizards, newts etc.
- Loss of natural carbon capture
- Decrease in food production capacity, look at the current threat posed by the reduction of grain from Ukraine and the shortages created by the recent COVID Lockdown for example. We need to grow more of our own food, not destroy prime farmland and rely on imports. Sustainability here is the key message!
- Increased local population placing further pressure on local schools, GP's surgeries (the one in Audley has already stated that it will be unable to cope), dentists and other services which are already oversubscribed.

As Dr. Austin has stated there appears to be an "overdevelopment which threatens nature and the already depleted biodiversity we see in this country". This is true both nationally and locally and the local populous feel that their opinions are disregarded on all political levels and by politicians of any political persuasion. It has been stated on national television that a large proportion of younger people and children are very worried about the effects of climate change and identifying areas of green belt to be built on will only enhance the problem. Allowing developers to destroy existing farmland, green spaces and mature woodland is short-sighted to say the least, it takes decades for a habitat to establish itself and support wildlife and replacing these with saplings will not solve the problem, therefore these proposals cannot be regarded as sustainable development at all. Do we really need all these new houses to combat the so-called housing shortage or is it really, as Dr. Austin states, "little more than a myth propagated by the construction industry and related interests"? Therefore, I agree with his analysis that "locally there are strong grounds for objections to development of the sites"

- AB12(p74)
- AB15(p75)
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Furthermore, I agree with Dr. Austin when he says that "both local and national authorities would do well to remember that they have a responsibility to the people they represent and not to the commercial viability of developers, the construction industry or overseas investors". As he has pointed out the commercial developments mooted for the AB2 and TK30 sites locally are not needed and I believe that the developers normal cry of "it will create jobs" is misleading to say the least and proposes far more land use than the councils own recently published assessment document of housing and economic needs suggests! Would the council please explain why they are intending to ignore their own document! Moreover, the proposal seems to be mainly for agricultural land, which once lost would be virtually impossible to recover. We need to be more sustainable in feeding ourselves and not relying on overseas imports whether they are from Europe or the wider world. It should also be noted that the country, as a whole, needs to stop foreign investing in building homes which the local populous can neither afford to buy or rent (there are countries in the world which will not allow non-native individuals/companies from buying/building houses – Thailand is a case in point). This would certainly enhance the prospects for affordable homes.

In summary, I would like to ask the council, and the government would they really like to be remembered as the politicians who made the local area and the UK as a whole a 'concrete wasteland'?

<b>Comment ID</b>	NULLP453
<b>Order</b>	147
<b>Title</b>	Policy AB2 'Land at Junction 16 of the M6'
<b>Consultee Family Name</b>	Woodward
<b>Consultee Given Name</b>	Colin
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I am writing to state my views on proposed development areas in the Audley Parish area.</p> <p><u>AB2:</u></p> <p>It is the enormity of what is proposed that is, I consider, irrational. The effective removal of 170 acres of good agricultural land to be replaced by vast warehouses will have a permanent destructive result on the entire area, including the ecology and wildlife. The effects on local traffic, and ensuing detrimental effects on the safety and health of those living in the area can only be imagined.</p> <p>As before, it is the scale rather than the principle of the development to which I most object. A substantially scaled down development might be more palatable to those affected, and limit the environmental damage which it would cause in its present form.</p> <p>As it stands, the scale of what is proposed is such that it will change the rural character of the entire area forever. This proposal requires significant rethinking and significant downsizing.</p>
<b>Comment ID</b>	NULLP452
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Woodward
<b>Consultee Given Name</b>	Colin
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>I am writing to state my views on proposed development areas in the Audley Parish area.</p> <p><u>AB12:</u></p> <p>It is quite frankly difficult to understand the rationale of building a proposed 150 homes in this green belt area. The access to this site will cause considerable difficulties for the residents on the access area, and the passage of perhaps 300 vehicles to and from the proposed homes will cause an already congested area to become substantially more so, and at times gridlocked.</p> <p>Given the location, the proposed homes would house commuters. The access to conurbations and employment areas would be via already congested roads, as well as rural areas, causing substantial pollution as well as substantial damage to wildlife and the environment, not to say danger to pedestrians.</p> <p>I appreciate that there might be a need for some house building in the area, but it is the scale of what is proposed which does not appear at all rational or logical. It is my understanding that the land on which the proposed housing is to be built is owned by a Local Authority, which might be a reason for even considering such a substantial and ruinous proposal to concrete over yet more of the countryside.</p>

<b>Comment ID</b>	NULLP275
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Worrall
<b>Consultee Given Name</b>	Carolyn
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>The proposed land at AB12 East of Diglake street.</p> <p>I believe that the policy of using this land is unsound.</p> <p>Access issues are significant given that the proposed access is down a street that has terraced housing on both sides and is difficult to access at present.</p> <p>At times large vehicles such as waste collection can not get access due to parking of residents vehicles.</p> <p>In this day and age many households have more than one vehicle that increases the problem especially where terraced housing is predominant.</p> <p>The local infrastructure can not cope with the current level of residents using the local facilities such as schools' Doctors' Dentist' and very little public transport.</p> <p>The land is currently green belt and part of a council farm that is rented to new and small farmers to help them develop.</p> <p><b>Therefore I would urge the planning Inspector to remove this site from the local plan.</b></p>

<b>Comment ID</b>	NULLP274
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Worrall
<b>Consultee Given Name</b>	Ray
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q6 Details</b>	<p>The proposed land at AB12 East of Diglake street.</p> <p>I believe that the policy of using this land is unsound.</p> <p>Access issues are significant given that the proposed access is down a street that has terraced housing on both sides and is difficult to access at present.</p> <p>At times large vehicles such as waste collection can not get access due to parking of residents vehicles.</p> <p>In this day and age many households have more than one vehicle that increases the problem.</p> <p>The local infrastructure can not cope with the current level of residents using the local facilities Doctors Dentist and very little public transport.</p> <p>The land is currently green belt and part of a council farm that is rented to new and small farmers to help them develop.</p> <p><b>Therefore I would urge the planning Inspector to remove this site from the local plan.</b></p>

<b>Comment ID</b>	NULLP1506
<b>Order</b>	6
<b>Number</b>	1
<b>Title</b>	Consultation (not part of the Plan)
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p> <p><b>Local Draft Plan</b></p> <p><b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b></p> <p><b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1 to check the unrestricted sprawl of large built-up areas;</li> <li>2 to prevent neighbouring towns merging into one another'</li> <li>3 to assist in safeguarding the countryside from encroachment;</li> <li>4 to preserve the setting and special character of historic towns; and</li> <li>5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p>

The Proforma for CT1A also states that *“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”* In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a “community hub”, we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having



	<p>looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:</b></p> <p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
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<b>Comment ID</b>	NULLP1505
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Adam
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q6 Details</b>	<p><b>Local Draft Plan</b></p> <p><b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas</p>

to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

#### **Local Draft Plan**

#### **Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)**

#### **Green Belt - Unsound**

Greenbelt land is in place for the following reasons:

- 1 to check the unrestricted sprawl of large built-up areas;
- 2 to prevent neighbouring towns merging into one another;
- 3 to assist in safeguarding the countryside from encroachment;
- 4 to preserve the setting and special character of historic towns; and
- 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that *“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”* In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

#### **Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:**

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.

<b>Comment ID</b>	NULLP1409
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Patricia
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p><b>Additional Comments:</b> Ground not stable enough with all the mine workings on CT1 the roads cannot take anymore traffic in this little village. Wildlife that will be lost habitat &amp; water this land holds, the A34 floods now so if the land cannot hold the water as is there will be major roads like A34 A500 being effected by this. Schools not big enough (520) homes. 2 kids to a property or more, pollution from 1000 vehicles.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1352
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Patricia
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b> <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b> When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town</p>

and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>



<b>Comment ID</b>	NULLP1373
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2
<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b>  <b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b></p> <p>When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1428
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Peter
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p>

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

#### **Historical Mining - Unsound**

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

#### **Land Ownership - Unsound**

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

#### **Infrastructure - Unsound**

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be

	<p>significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.</p> <p>The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Newcastle under lyme population declining so why build here</p> <p>Stop destroying green belt, there are plenty of brown belt sites</p> <p>GLOBAL WARMING</p> <p>Well tendered fields of gorins snakes, a lot of carbon up. brownbelt sites only</p>
<b>Q7 Modification</b>	<p>We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>

<b>Comment ID</b>	NULLP126
<b>Order</b>	172
<b>Title</b>	Policy KL15 Land South of A525 Keele
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Tish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL15
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>Legally compliant and sound is irrelevant to my points which I gave at a recent 'consultation' at the Sneyd Arms on 19/9/24.</p> <p>The officer I spoke to was less than interested in my two main points &amp; I was handed this form to complete. No debate.</p> <p>1) The target of 400 homes in Keele PA is ludicrous &amp;, whereas I realise its based purely on the Government's potty policy of numbers, it is <u>NOT</u> based on population data, or need. It's 'finger in the wind' thinking.</p> <p>2) When the Local Plan was drawn up, there was <u>NO</u> Government policy to build on green belt. You are destroying our countryside &amp; yet you want to achieve 'net zero'. Talk me through that then.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP127
<b>Order</b>	30
<b>Title</b>	Policy PSD5: Green Belt
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Tish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD5
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>Legally compliant and sound is irrelevant to my points which I gave at a recent 'consultation' at the Sneyd Arms on 19/9/24.</p> <p>2) When the Local Plan was drawn up, there was <u>NO</u> Government policy to build on green belt. You are destroying our countryside &amp; yet you want to achieve 'net zero'. Talk me through that then.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP125
<b>Order</b>	170
<b>Title</b>	Policy KL13 Keele Science Park Phase 3
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Tish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	KL13
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>Legally compliant and sound is irrelevant to my points which I gave at a recent 'consultation' at the Sneyd Arms on 19/9/24.</p> <p>The officer I spoke to was less than interested in my two main points &amp; I was handed this form to complete. No debate.</p> <p>1) The target of 400 homes in Keele PA is ludicrous &amp;, whereas I realise its based purely on the Government's potty policy of numbers, it is <u>NOT</u> based on population data, or need. It's 'finger in the wind' thinking.</p> <p>2) When the Local Plan was drawn up, there was <u>NO</u> Government policy to build on green belt. You are destroying our countryside &amp; yet you want to achieve 'net zero'. Talk me through that then.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)
<b>Comment ID</b>	NULLP332
<b>Order</b>	26

<b>Title</b>	Policy PSD3: Distribution of Development
<b>Consultee Family Name</b>	Wright
<b>Consultee Given Name</b>	Tish
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	PSD3
<b>Q5 Sound</b>	No
<b>Q7 Modification</b>	<p>Legally compliant and sound is irrelevant to my points which I gave at a recent 'consultation' at the Sneyd Arms on 19/9/24.</p> <p>2) When the Local Plan was drawn up, there was <u>NO</u> Government policy to build on green belt. You are destroying our countryside &amp; yet you want to achieve 'net zero'. Talk me through that then.</p>
<b>Q8 Hearing attendance</b>	No, I do not wish to participate in hearing session(s)

<b>Comment ID</b>	NULLP1136
<b>Order</b>	149
<b>Title</b>	Policy AB12 Land East of Diglake Street
<b>Consultee Family Name</b>	Wykes
<b>Consultee Given Name</b>	Susan
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	AB12
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p>1) Access- Diglake St is a narrow Victorian road, lived with terrace houses. Junction on to Ravens Lane inadequate</p> <p>2) If accident on M6, A500, majority of vehicles come through village, causing traffic jams.</p> <p>3) Already difficult for pedestrians to cross Ravens Lane, accident waiting to happen.</p> <p>4) Sewers already block up after heavy rain</p> <p>5) The field floods at bottom end, farmer can't cut it</p> <p>6) Difficulty already getting a doctors appointment</p> <p>7) School cannot accommodate any more children</p> <p>8) We get a lot of power cuts, can supply cope</p>



<b>Comment ID</b>	NULLP1459
<b>Order</b>	159
<b>Title</b>	Policy CT1 Land at Red Street and High Carr Farm, Chesterton
<b>Consultee Family Name</b>	Zwetschnikow
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Policy
<b>Q4 Policy</b>	CT1
<b>Q5 Sound</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)</b>  <b>Green Belt - Unsound</b></p> <p>Greenbelt land is in place for the following reasons:</p> <ol style="list-style-type: none"> <li>1. to check the unrestricted sprawl of large built-up areas;</li> <li>2. to prevent neighbouring towns merging into one another'</li> <li>3. to assist in safeguarding the countryside from encroachment;</li> <li>4. to preserve the setting and special character of historic towns; and</li> <li>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ol> <p>The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)</p> <p>Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.</p> <p>The Proforma for CT1A also states that "Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4)." In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.</p> <p>Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.</p> <p>Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.</p> <p>Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.</p> <p><b>Historical Mining - Unsound</b></p> <p>Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.</p> <p>The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.</p> <p>Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.</p> <p><b>Land Ownership - Unsound</b></p> <p>Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?</p> <p><b>Infrastructure - Unsound</b></p> <p>We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles</p>

	<p>will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.</p> <p>Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.</p> <p>The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.</p> <p>In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.</p> <p>Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area. The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.</p> <p>Additional Comments</p> <p>Cross over from Crackley Bank onto Liverpool Road every morning and afternoon is chaotic with buses trying to pass but can't because of parked cars of parents dropping or picking up school children from St Chads, the residents of this area have had car mirrors broken, cars scratched etc. The road narrows at this point, just after the raised crossing for school children. I have witnessed road rage, drivers swearing and near accidents. If the A34 is blocked, drivers use Red Street as a rat run, I have seen and felt double trailered HGVs using Red Street as a divert and my house has shaken. I cannot imagine what additional traffic would do to our roads and infrastructure, children would be put under great stress and danger with the unmanned crossing and additional traffic. If the government are still thinking of putting forward no cars on pavements, this will only make it more difficult for this tiny village. Most houses in this area were built in the early 1900s so the roads were not meant for the possible amount of traffic if this build were to go ahead.</p>
<b>Q7 Modification</b>	We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>
<b>Comment ID</b>	NULLP1395
<b>Order</b>	7
<b>Title</b>	How to respond to the consultation
<b>Consultee Family Name</b>	Zwetschnikow
<b>Consultee Given Name</b>	Mr and Mrs
<b>Q4 Part of document</b>	Paragraph
<b>Q4 Paragraph number</b>	1.2

<b>Q5 DTC compliant</b>	No
<b>Q6 Details</b>	<p><b>Local Draft Plan</b>  <b>Stages of development of the Local Plan (Page 4)</b></p> <p><b>Regulation 19 Publication – Not Compliant with Duty to Co-operate</b>  When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.</p> <p>Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.</p> <p>As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.</p> <p>Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.</p>
<b>Q10 File 1</b>	6383617
<b>Attachments</b>	<a href="#">reg 19 red street diagram.png</a>