emery PLANNING

1-4 South Park Court, Hobson Street
Macclesfield, Cheshire, SK11 8BS
+44 (0) 1625 433 881

Regus House, Herons Way,
Chester Business Park, CH4 9QP
+44 (0) 1244 732 447

Mr Allan Clarke
Newcastle Under Lyme Borough Council
Castle House
Barracks Road
Newcastle Under Lyme
ST5 1BL

17 September 2025
EP ref: 17-426

By e-mail only: Allan Clarke Allan.Clarke@newcastle-staffs.gov.uk

Dear Mr Clarke

Re: Site TK27 – Supplementary information in response to EX/INS/06

On behalf of our client, The Strategic Land Group (SLG), we hereby provide the following information to assist in your response to the Inspector's letter dated 1 August 2025 (EX/INS/06), specifically in respect of surface water flood risk and Green Belt compensatory improvements. SLG's specific interest is Site TK27: Land off Coppice Road, Talke.

Surface Water Flood Risk

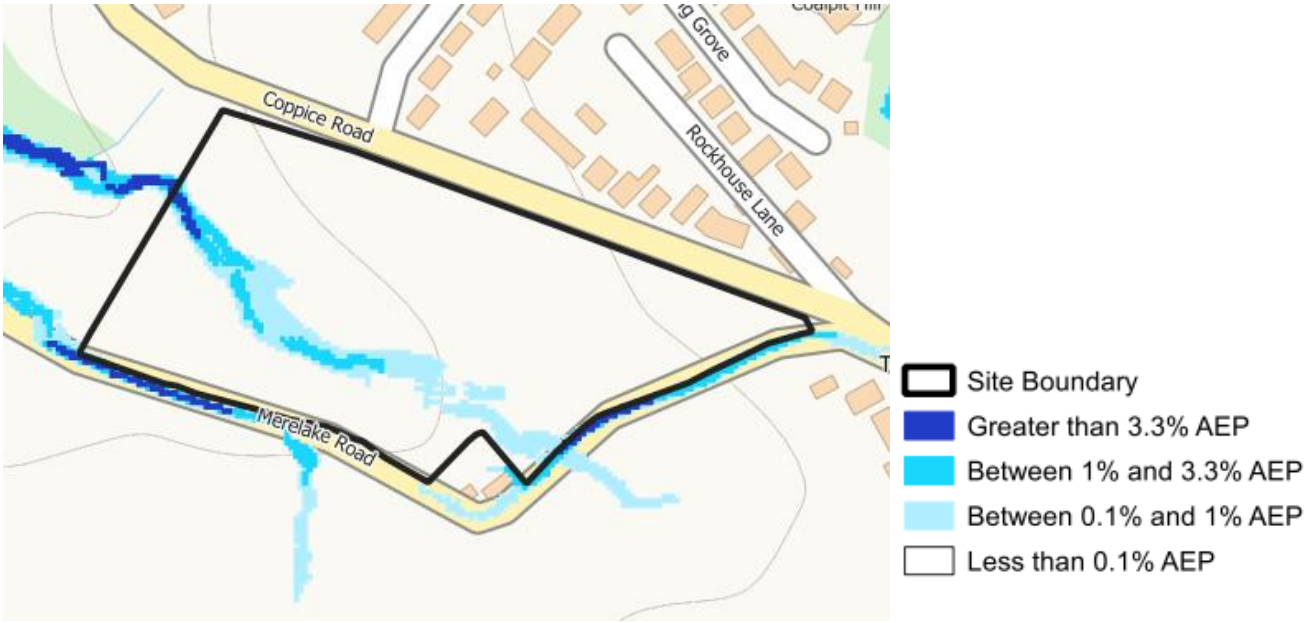
Paragraph 14 of EX/INS/06 states:

> "From an assessment of the SFRA2 it would appear that the indicative yield on a number of "amber" sites is optimistic and the Council should review these."

Site TK27 is one of the 'amber' sites in the SFRA2. The SFRA2 identifies that the site comprises 2.823 ha. It is allocated to deliver approximately 90 dwellings. Draft Policy HOU2 states that within the urban centre of Kidsgrove, development should achieve a net density of around 30 – 40 dwellings per hectare (dph).

The Development Prospectus submitted alongside our Regulation 19 representations contains a masterplan, which shows one way in which the site could be developed, having regard to a range of technical assessments that have been undertaken to date. Of the 2.823 ha site, the masterplan assumes a developable area of only 2.2 hectares, which if developed at 40 dph equates to approximately 90 dwellings.

An extract from the surface water flood risk mapping for site TK27 at Appendix D of the SFRA (EX/NBC/06e) is provided below:



The light blue areas (between 0.1% and 1% AEP) equate to 'low' chance of flooding. The darker blue areas equate to 'medium' and 'high'. Table 2-2 of the NaFRA2 addendum (EX/NBC/06a) identifies that, according to the January 2025 EA mapping, only 1% of the site falls within the NaFRA2 RoFSW 3.3% AEP Extent (High) and only 3% falls within the NaFRA2 RoFSW 1% AEP Extent (Medium). Under the previous data, the areas affected comprised an even smaller proportion of the site. The areas affected would not affect the site access and, if necessary, could easily be incorporated within the green infrastructure framework.

The NaFRA2 addendum discusses the complications in relation to the EA data around climate change, and states that further assessment of the potential impacts of climate change on surface water will need to be considered at the site-specific FRA stage. As the letter from Brookbanks identifies, the latest data from the EA models climate change to 2060, and shows that in that scenario the overall area of medium and high risk surface water flooding equates to only 7.5% of the site. But even in the worst-case scenario identified in the SFRA (which utilises now superseded data), only 14% of the site falls within the 1% AEP (see EX/NBC/06b: Appendix A Site Screening Spreadsheet). Again, it is considered that this could be comfortably accommodated within the green infrastructure framework without affecting the overall quantum of developable area or number of dwellings.

We also enclose a letter from our client's drainage consultant, Brookbanks, which addresses surface water flood risk in further detail, including analysis of the SFRA and the latest data from the EA. This demonstrates that the actual area of medium and high risk is very limited. It also identifies that there is a need to undertake further analysis at the planning application stage through a site-specific FRA, including potentially modelling. This will utilise the latest data, including in relation to climate change.

Taking into account the SFRA and the further information from Brookbanks, there is nothing to suggest that the site cannot be developed for approximately 90 dwellings. A conservative approach was applied to the developable area in SLG's masterplan. It is considered that the indicative capacity can be achieved whilst avoiding areas of surface water flood risk.

You will also note that the Brookbanks letter refers to the Faversham appeal decision (PINS ref: APP/V2255/W/24/3350524), where it was found that development within areas currently shown as being of medium and high surface water flood risk can be acceptable even where the sequential test has not been undertaken, if the proposed development would not (as a result of a drainage scheme) result in any 'real-world risk'. However, since Brookbanks' letter, things have moved on further with today's changes to the PPG. Paragraph 27-027 of the PPG states:

> "In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design,

> and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."

As such, there is potential for areas currently shown as being at medium and high risk of surface water flooding to be developed without triggering the need for a sequential test. In the case of site TK27, the masterplan included within the Development Prospectus was developed with drainage input and is based on a scheme which would ensure that the development is not at risk from current and future surface water flood risk.

Therefore, notwithstanding our view that the proposed quantum of development is realistic even if an approach of 'avoiding' areas of medium and high risk is taken, under the amended PPG there is significant scope to unlock these areas at the planning application stage. Accordingly, the changes to the PPG should provide additional comfort to the Council and the Inspector that the proposed quantum of development is realistic.

Compensatory Improvements to the Green Belt

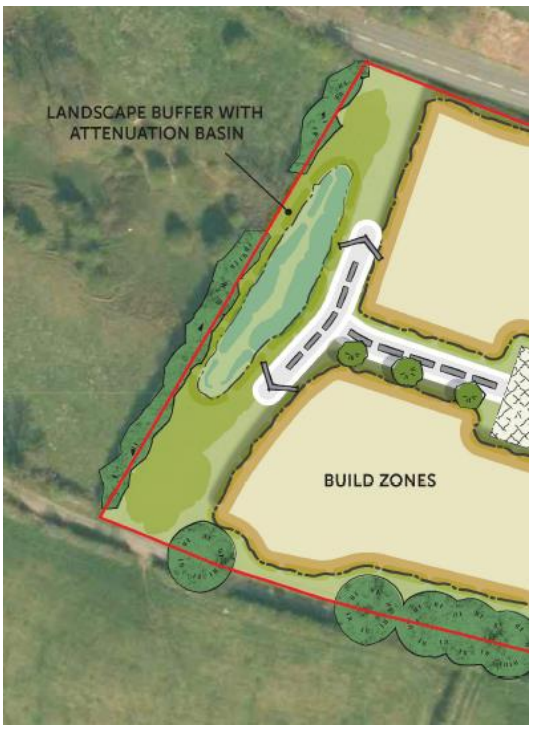
Paragraphs 36 – 38 of EX/INS/06 refer to compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. For each allocation, the Council is seeking to identify potential measures, and demonstrate on that these are viable and achievable. However, quite rightly, the Council do not at this stage wish to fix specific compensatory measures for each site. Instead, the specific measures and details will be considered further at the planning application stage.

In respect of site TK27, the proposed allocation represents a modest release of Green Belt, and the compensatory measures should be proportionate to that. The previous version of the PPG set out the following examples of compensatory improvements:

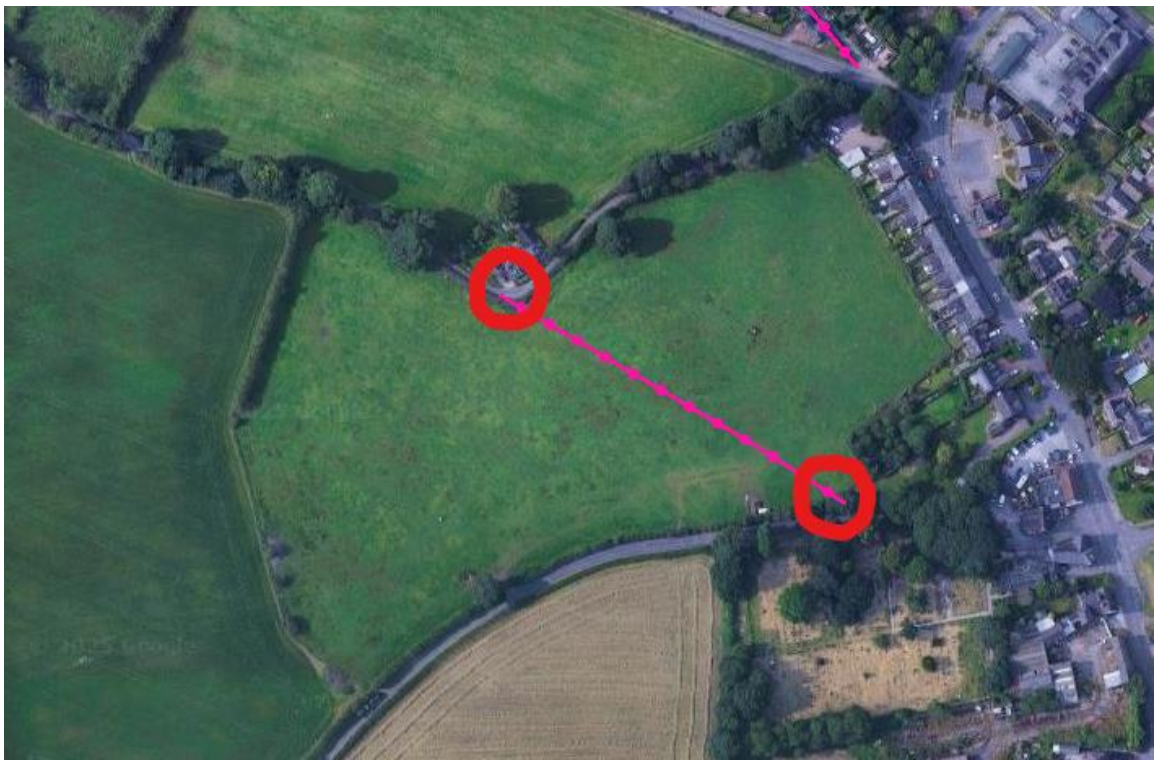
- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

In the case of Site TK27, the following compensatory measures are proposed.

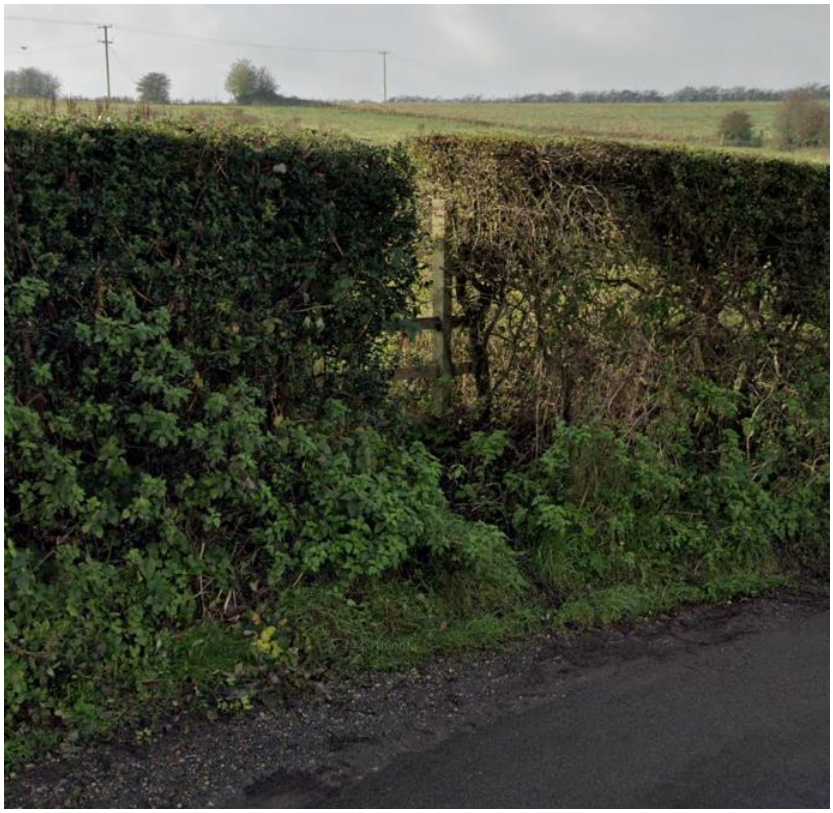
Firstly, the proposed development would include an area of new green infrastructure along the eastern boundary of the site, where it interfaces with the wider Green Belt. This would feature new tree planting and provides opportunities for improvements to biodiversity and habitat connectivity. There may also be potential for public access in via a recreational footpath, subject to the detailed design to be agreed at the planning application stage. An extract from the concept masterplan submitted alongside our Regulation 19 representations (see page 24 of the Development Propsectus) is provided below:



Secondly, there is potential to provide improvements to the footpath that runs from Merelake Road, at the southern boundary of the site, in a south-easterly direction to Audley Road (adjacent to the Church of St Martin). The footpath is shown on the plan below, with the access points highlighted:

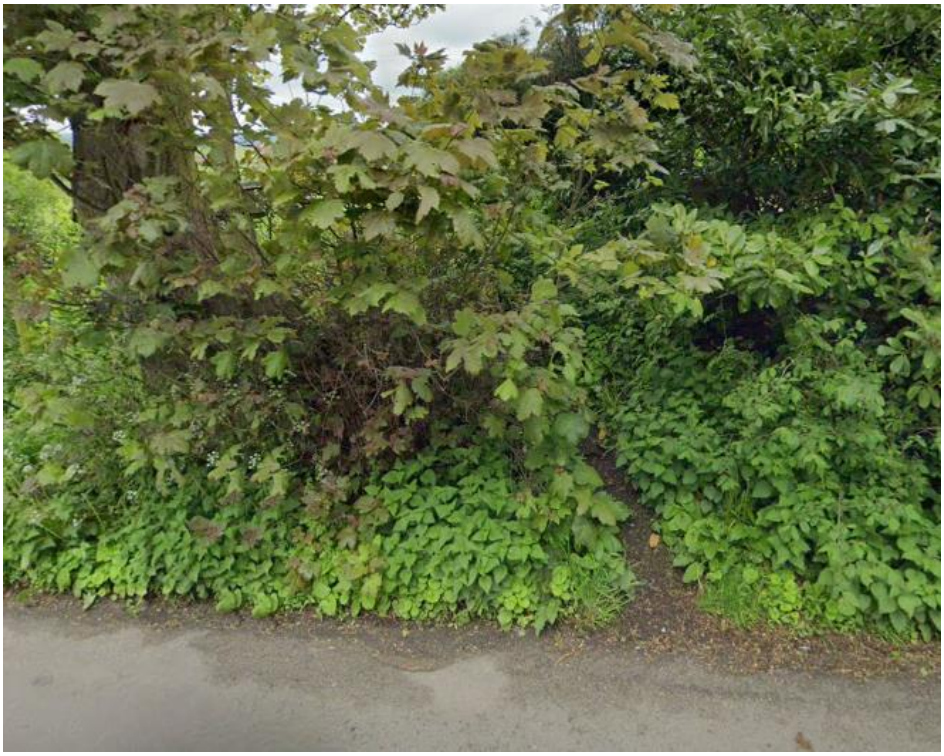


Potential improvements are likely to be in the form of improved stiles, and enhancements around those stiles, to improve accessibility and the attractiveness of the route. The connection point at Merelake Road comprises a basic wooden stile which sits within a large hedgerow, as shown in the image below:



This type of stile can be an impediment to those with restricted mobility. There is potential to replace the stile with a metal kissing gate, which is far more accessible to all users.

The connection at Audley Road also comprises a basic wooden stile, albeit it is hidden behind extensive foliage, which in spring and summer months can make the path difficult to locate and navigate, as shown in the image below:



Again, there is potential to replace the stile with a metal kissing gate. There is also potential to improve the accessibility and legibility of the section of path from the edge of the carriageway to the stile. Other potential enhancements include improved signage. It is considered that these simple but effective compensatory measures can be delivered without impacting upon the viability of the proposed development.

In addition, we note that the Council is actively pursuing other opportunities to deliver compensatory improvements within Kidsgrove and the wider borough. We support this approach, which will ensure that the community benefits of compensatory measures are maximised. We will continue to work with the Council as we prepare a planning application for residential development to ensure that the most appropriate and effective compensatory improvements are taken forward.

I trust the above information assists with your response. Should you require any further information, please do not hesitate to contact me.

Yours sincerely
Emery Planning

John Coxon BSc (Hons), MRTPI
Director

01625 442 785
johncoxon@emeryplanning.com

Enc: Letter from Brookbanks re: surface water flood risk